

Hearing Date: August 4, 2021 at 9:30 a.m. (ET)/ 9:30 a.m. (AST)  
Objection Deadline: April 5, 2021 at 4:00 p.m. (ET)/ 4:00 p.m. (AST)

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**In re:**

**PROMESA  
Title III**

**THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,**

**No. 17 BK 3283-LTS**

**as representative of**

**(Jointly Administered)**

**THE COMMONWEALTH OF PUERTO RICO, *et al.*,**

**Debtors.<sup>1</sup>**

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**FIFTH INTERIM FEE APPLICATION OF GENOVESE JOBLOVE & BATTISTA, P.A.,  
AS SPECIAL LITIGATION COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS, FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD OF SEPTEMBER 1, 2020 THROUGH JANUARY 31, 2021**

**SUMMARY COVER SHEET**

Name of applicant:	Genovese Joblove & Battista, P.A. (“ <u>GJB</u> ”)
Authorized to provide professional services to:	Special Litigation Counsel for the Official Committee of Unsecured Creditors (the “ <u>Committee</u> ”) <sup>2</sup>

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

Name of Client:	Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA)
Petition Date:	May 3, 2017
Date of retention:	May 31, 2019, effective as of April 16, 2019 [Docket No. 7181]
Period for which compensation and reimbursement are sought:	September 1, 2020 through and including January 31, 2021(the "Application Period")
Amount of interim compensation sought as actual, reasonable, and necessary:	\$499,302.23 <sup>3</sup>
Amount of interim expense reimbursement sought as actual, reasonable, and necessary:	\$31,381.55
Are your fee or expense totals different from the sum of previously-served monthly statements for the Application Period?	No.
Total compensation approved by interim order to date:	\$657,907.05 (First Interim Fee Order ECF No. 9046) \$1,339,434.84 (Second Interim Fee Order ECF No. 13296) \$1,171,906.40 (Third Interim Fee Order ECF No. 13824) \$887,215.20 (Fourth Interim Order ECF No. 15971)
Total expenses approved by interim order to date:	\$3,848.56 (First Interim Fee Order ECF No. 9046) \$43,602.27(Second Interim Fee Order ECF No. 13296) \$33,296.95 (Third Interim Fee Order ECF 13824) \$54,671.58 (Fourth Interim Order ECF No. 15971)
Total allowed compensation paid to date:	\$3,988,449.46
Total allowed expenses paid to date:	\$159,813.34
Blended rate in this Application for all attorneys:	\$506.09/hour <sup>4</sup>

<sup>3</sup> The full amount of fees incurred by GJB during the Application Period total \$499,302.23. GJB agreed taking a voluntary fee reduction equal to 20% in the amount of \$99,860.44 and, thereby, seeks allowance and payment of fees in the amount of \$399,441.79. By the time of the hearing on this Application, a portion of this amount should have been paid by the Debtors pursuant to the Interim Compensation Order, and GJB reserves its rights to seek relief from the Court to the extent any outstanding fees and expenses that are due and payable are not paid on the terms set forth in the Interim Compensation Order.

<sup>4</sup> The calculation of the blended hourly rates reflected in this Application Period does not take into account GJB's agreement to reduce its fees by an amount equal to 20% of its hourly rates.

Blended rate in this Application for all timekeepers:	\$463.47/hour
Total compensation sought in this Application already paid pursuant to a monthly compensation order but not yet allowed:	\$0.00
Total expenses sought in this Application already paid pursuant to a monthly compensation order but not yet allowed.	\$0.00
Total time expended for fee application preparation during the Application Period:	45.70
Total compensation requested for fee application preparation during the Application Period:	\$13,026.50
Number of professionals included in this Application:	13
If applicable, number of professionals in this Application not included in a staffing plan approved by the client:	N/A
If applicable, difference between fees budgeted and compensation sought for the Application Period:	\$569,383.37 (less than the budgeted fees)
Number of professionals billing fewer than 15 hours to the case during the Application Period:	6
Are any timekeeper's hourly rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this Application using the rates originally disclosed in the retention application:	None.

**SUMMARY OF PRIOR MONTHLY FEE STATEMENTS FOR THE COMPENSATION PERIOD FROM APRIL 19, 2019 THROUGH JANUARY 31, 2021**

<b>Date</b>	<b>Period Covered</b>	<b>Total Fees</b>	<b>20% Discount</b>	<b>Fees Requested (90%)</b>	<b>Holdback (10%)</b>	<b>Expenses Requested</b>	<b>Fees Paid</b>	<b>Expenses Paid</b>
July 9, 2019	April 19, 2019 - April 30, 2019	\$386,294.25	\$309,035.40	\$278,131.86	\$30,903.54	\$2,539.46	\$278,131.86	\$2,539.46
July 15, 2019	May 1, 2019- May 31, 2019	\$305,448.00	\$244,358.40	\$219,922.56	\$24,435.84	\$7,833.59	\$219,922.56	\$7,833.59
August 27, 2019	June 1, 2019- June 30, 2019	\$382,072.25	\$305,657.78	\$275,092.02	\$30,565.73	\$1,389.18	\$213,003.75	\$1,389.18
September 27, 2019	July 1, 2019- July 31, 2019	\$407,887.50	\$326,310.00	\$293,679.00	\$32,631.00	\$24,948.34	\$251,157.08	\$24,948.34
November 5, 2019	August 1, 2019- August 30, 2019	\$385,731.00	\$308,584.80	\$277,726.32	\$30,858.48	\$15,291.51	\$198,757.11	\$15,218.16
November 14, 2019	September 1, 2019- September 30, 2019	\$553,257.25	\$442,605.80	\$398,345.22	\$44,260.58	\$1,973.24	\$207,078.94	\$1,942.64
January 10, 2020	October 1, 2019- October 31, 2019	\$606,059.25	\$484,847.40	\$436,362.66	\$48,484.74	\$7,695.88	\$236,682.26	\$4,153.17
March 2, 2020	November 1, 2019- November 30, 2019	\$418,140.50	\$334,512.40	\$301,061.16	\$33,451.24	\$7,321.13	\$215,445.16	\$7,233.83
March 2, 2020	December 1, 2019- December 31, 2019	\$263,706.75	\$210,965.54	\$189,868.86	\$21,096.68	\$9,617.26	\$138,657.53	\$8,191.43
March 12, 2020	January 1, 2020- January 31, 2020	\$206,881.25	\$165,505.00	\$148,954.50	\$16,550.50	\$8,662.68	\$83,963.47	\$8,662.68
June 18, 2020	February 1, 2020- February 29, 2020	\$238,539.50	\$190,831.16	\$171,748.44	\$19,082.72	\$7,346.58	\$168,535.89	\$7,346.58



August 6, 2020 <sup>5</sup>	March 1, 2020-March 31, 2020	\$250,466.00	\$200,372.80	\$180,335.52	\$20,037.28	\$5,314.26	\$177,686.89	\$5,257.86
August 6, 2020	April 1, 2020-April 30, 2020	\$249,058.50	\$199,246.80	\$179,322.12	\$19,924.68	\$7,029.08	\$176,632.29	\$7,029.08
August 6, 2020	May 1, 2020-May 31, 2020	\$92,866.50	\$74,293.20	\$66,863.88	\$7,729.32	\$7,029.08	\$65,860.92	\$7,029.08
August 19, 2020	June 1, 2020-June 30, 2020	\$69,628.50	\$55,702.80	\$50,132.52	\$5,570.28	\$15,489.56	\$49,380.53	\$15,489.56
September 17, 2020	July 1, 2020-July 31, 2020	\$107,955.50	\$86,364.40	\$77,727.96	\$8,636.44	\$7,384.90	\$76,562.04	\$7,384.90
November 12, 2020	August 1, 2020-August 31, 2020	\$116,027.50	\$92,822.00	\$85,539.80	\$9,282.20	\$7,093.72	\$83,539.80	\$7,093.72
December 17, 2020	September 1, 2020-September 30, 2020	\$188,671.00	\$150,936.80	\$135,843.12	\$15,093.68	\$8,354.64	\$133,805.47	\$8,354.62
February 2, 2021	October 1, 2020-October 31, 2020	\$140,400.50	\$112,320.40	\$101,088.36	\$11,232.04	\$7,331.55	\$99,572.03	\$7,331.55
January 29, 2021	November 1, 2020-November 30, 2020	\$71,106.50	\$56,885.20	\$51,196.68	\$5,688.52	\$7,317.84	\$50,428.73	\$7,317.84
February 12, 2021	December 1, 2020-December 31, 2020	\$64,868.73	\$51,894.84	\$46,705.48	\$5,189.48	\$8,377.54	N/A	N/A
March 1, 2021	January 1, 2021-January 31, 2021	\$34,255.50	\$27,404.40	\$24,663.96	\$2,740.44	N/A	N/A	N/A

**Summary of Amounts Requested to be Paid**

Total Unpaid Fees: **\$135,460.40**

Total Unpaid Expenses: **\$8,377.54**

Total 10% Holdback on Fees: **\$39,944.16**

Reimbursement for 29% Tax Withholding: N/A

Reimbursement for 1.5% Government Contribution: **\$5,022.51**

Less expenses voluntarily reduced herein: N/A

**Total Amount Requested to be Paid in Fees and Expenses for this period: \$143,837.94**

**PRIOR INTERIM FEE APPLICATIONS**

**First Interim Fee Application**

<b>Date Filed</b>	<b>DE#</b>	<b>Period Covered</b>	<b>Total Fees</b>	<b>20% Discount</b>	<b>Fees Requested (90%)</b>	<b>Holdback (10%)</b>	<b>Expenses Requested</b>
7/15/19	7994	April 19, 2019-May 31, 2019	\$691,742.25	\$553,393.80	\$498,054.42	\$55,339.38	\$10,373.05

**Second Interim Fee Application**

<b>Date Filed</b>	<b>DE#</b>	<b>Period Covered</b>	<b>Total Fees</b>	<b>20% Discount</b>	<b>Fees Requested (90%)</b>	<b>Holdback (10%)</b>	<b>Expenses Requested</b>
11/15/19	9213	June 1, 2019-September 30, 2019	\$1,728,948.00	\$1,383,158.40	\$1,244,842.56	\$138,315.84	\$43,602.27

**Third Interim Fee Application**

<b>Date Filed</b>	<b>DE#</b>	<b>Period Covered</b>	<b>Total Fees</b>	<b>20% Discount</b>	<b>Fees Requested (90%)</b>	<b>Holdback (10%)</b>	<b>Expenses Requested</b>
3/15/20	12409	October 1, 2019-January 31,2020	\$1,494,787.75	\$1,195,830.20	\$1,076,247.18	\$119,583.02	\$33,296.95

**Fourth Interim Fee Application**

<b>Date Filed</b>	<b>DE#</b>	<b>Period Covered</b>	<b>Total Fees</b>	<b>20% Discount</b>	<b>Fees Requested (90%)</b>	<b>Holdback (10%)</b>	<b>Expenses Requested</b>
11/16/20	15142	February 1,2020 -August 31,2020	\$1,124,542.00	\$899,633.60	\$809,670.24	\$89,963.36	\$56,687.18

**SUPPORTING CERTIFICATION, EXHIBITS, AND SCHEDULES**

In accordance with the U.S. Trustee Guidelines, at the end of this Application are the following Exhibits and Schedules:

EXHIBIT A	CERTIFICATION OF JOHN H. GENOVESE IN SUPPORT OF APPLICATION
EXHIBIT B	CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES
EXHIBIT C	SUMMARY OF TIMEKEEPERS INCLUDED IN THIS APPLICATION
EXHIBIT D	BUDGETS AND STAFFING PLANS FOR APPLICATION PERIOD
EXHIBIT E	SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY
EXHIBIT E-1	SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY AS COMPARED TO BUDGET
EXHIBIT E-2	SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY
EXHIBIT F	BREAKDOWN OF COMPENSATION AND EXPENSE REIMBURSEMENT REQUESTED AND BY WHETHER SERVICES WERE RENDERED IN PUERTO RICO OR OUTSIDE PUERTO RICO
SCHEDULE 1	LIST OF PROFESSIONALS BY MATTER
SCHEDULE 2	MONTHLY STATEMENTS COVERED IN APPLICATION
SCHEDULE 3	PROPOSED ORDER

Hearing Date: August 4, 2021 at 9:30 a.m. (ET)/ 9:30 a.m. (AST)  
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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**In re:**

**THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,**

**as representative of**

**THE COMMONWEALTH OF PUERTO RICO, *et al.*,**

**Debtors.<sup>6</sup>**

**PROMESA  
Title III**

**No. 17 BK 3283-LTS**

**(Jointly Administered)**

**FIFTH INTERIM APPLICATION OF GENOVESE JOBLOVE & BATTISTA, P.A,  
SPECIAL LITIGATION COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS, FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR PERIOD FROM  
SEPTEMBER 1, 2020 THROUGH JANUARY 31, 2021**

To The Honorable United States District Judge Laura Taylor Swain:

Genovese Joblove & Battista, P.A. (“GJB”), special litigation counsel to the Official Committee of Unsecured Creditors (the “Committee”),<sup>7</sup> in the above-captioned Title III cases (the “Title III Cases”) hereby submits its Fifth interim fee application (the “Application”) for allowance

<sup>6</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>7</sup> Prior to August 25, 2017, the Committee was the Official Committee of Unsecured Creditors for the Commonwealth’s Title III case only. On August 25, 2017, the U.S. Trustee expanded the Committee’s role to also include the Title III cases of HTA, ERS, and PREPA.

of compensation for professional services rendered, and reimbursement for actual and necessary expenses incurred in connection with such services, for the period from September 1, 2020 through January 31, 2021 (the “Application Period”). GJB submits this Application pursuant to sections 316 and 317 of the Puerto Rico Oversight, Management and Economic Stability Act of 2016 (“PROMESA”),<sup>8</sup> section 503(b) of Title 11, United States Code (the “Bankruptcy Code”) as made applicable to these cases by section 301(a) of PROMESA, Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the District of Puerto Rico (the “Local Rules”), *Appendix B of the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* issued by the Executive Office for the United States Trustee, 28 CFR Part 58, Appendix B (the “Guidelines”), and in accordance with this Court’s the *First Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (“Interim Compensation Order”) [Docket No. 1715]; the *Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (“Second Interim Compensation Order”) [Docket No. 3269]; the Fee Examiner’s November 10, 2017 Memorandum (the “Fee Examiner Memorandum”); the Court’s *Order on Fee Examiner’s Motion to Impose Presumptive Standards and Timeliness requirements for Professional Fee Applications* (the “Presumptive Order”) [Docket No. 3932]; and the Court’s *Order Imposing Additional Presumptive Standards: Rate Increases and the Retention of Expert Witnesses or Other Sub-retained Professionals* (the “Revised Presumptive Order”) [Docket No. 7678]. In support of the Application, GJB submits the Certification of John H. Genovese (the “Genovese Certification”), attached hereto as **Exhibit A**, and respectfully represents as follows:

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<sup>8</sup> References to PROMESA are references to 48 U.S.C. §§ 2101 *et. seq.*

### **Jurisdiction and Venue**

1. The Court has subject matter jurisdiction to consider and determine this ~~Filing~~ Interim Application pursuant to PROMESA section 306(a). Venue is proper before this Court pursuant to PROMESA section 307(a). The statutory predicates for the relief requested herein are PROMESA sections 316 and 317, Bankruptcy Rule 2016 and Local Rule 2016-1.

2. This Application has been prepared in accordance with the Guidelines and the Interim Compensation Order. Attached hereto as **Exhibit A** is a certification regarding compliance with the Local Guidelines.

3. This Application is consistent with the Interim Compensation Order (as defined below), Local Rule 2016-1, and *Appendix B of the United States Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* (the "U.S. Trustee Guidelines"). To the extent necessary, GJB requests a waiver for cause shown of any requirements not met by this Application.<sup>9</sup>

### **BACKGROUND**

#### **A. Case Background**

4. On May 3, 2017, the Oversight Board commenced a Title III case for the Commonwealth of Puerto Rico by filing a voluntary petition for relief pursuant to section 304(a) of PROMESA (the "Commonwealth Title III Case"). Thereafter, the Oversight Board commenced a Title III case for each of COFINA, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (the "ERS Title III Case"), the Puerto Rico Highways and Transportation Authority (the "HTA Title III Case"), and the Puerto Rico Electric Power Authority

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<sup>9</sup> The Committee and GJB reserve all rights as to the relevance and substantive legal effect of the U.S. Trustee Guidelines with respect to any application for compensation in these cases.

(the “PREPA Title III Case”) (and together with the Commonwealth Title III Case, the “Title III Cases”).<sup>10</sup> By orders dated June 29, 2017 [Docket No. 537] and October 6, 2017 [Docket No. 1417], the Court approved the joint administration of the Title III Cases.

5. On June 15, 2017, the Office of the United States Trustee for the District of Puerto Rico (the “U.S. Trustee”) filed a *Notice Appointing Creditors Committee for Unsecured Creditors* [Docket No. 338]. Thereafter, on the U.S. Trustee modified the composition of the Committee membership [Docket Nos. 1171, 3058, and 3947], such that, currently, the members of the Committee are the American Federation of Teachers, Baxter Sales and Distribution Puerto Rico Corp., Doral Financial Corporation, Genesis Security Services, Inc., Service Employees International Union, Tradewinds Energy Barceloneta, LLC, and Unitech Engineering Group, S.E. (the “Committee Members”) [Docket No. 3947].

6. On August 25, 2017, the U.S. Trustee filed an *Amended Notice of Appointment of Official Committee of Unsecured Creditors* [Docket No. 1171], which expanded the role of the Committee to be the official committee for the HTA Title III Case, the ERS Title III Case, and the PREPA Title III Case.

**B. Retention of Genovese Joblove & Battista, P.A.**

7. On April 16, 2019, the Committee selected GJB as proposed special litigation counsel to the Committee in connection with the evaluation and analysis of potential causes of action and representation as co-plaintiff in the filing and prosecution of certain claims and causes of action to be asserted against certain parties involved in the offering of (a) the Commonwealth’s General Obligation bonds (“GO Bonds”), (b) bonds issued by the Public Buildings Authority (“PBA”), and (c) bonds issued by ERS (“ERS”), including bond counsel, disclosure counsel,

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<sup>10</sup> Unless otherwise indicated, references to docket numbers shall be to the docket of the Commonwealth Title III Case.



underwriters, underwriters' counsel, swap counterparties, or auditors (collectively, the "Financial Party Targets").

8. Upon its retention on April 16, 2019, and prior to entry of the *Stipulation and Agreed Order By and Among Financial Oversight and Management Board, Its Special Claims Committee, and Official Committee of Unsecured Creditors to Joint Prosecution of Debtor Causes of Action* [Doc No. 6524 ] (the "Joint Prosecution Stipulation"), GJB immediately started assisting the Committee with respect to the Committee's motion to pursue certain causes of action on behalf of the Commonwealth, filed with the court on April 17, 2019 [Docket No. 6325] (the "926 Motion"), including the reply in further support of the 926 Motion, filed with the court on April 22, 2019 [Docket No. 6458]. Additionally, GJB evaluated and analyzed certain potential causes of actions against the Financial Party Targets in order to file the Co-Plaintiff Adversary Proceedings against such Financial Party Targets on or before the Commonwealth's statute of limitation deadline or after expiration or termination of the Tolling Agreements with respect to such Financial Party Targets. These tasks required a great deal of work in a very short period of time due to the impending statute of limitations deadline of May 2, 2019.

9. The retention of a special litigation counsel was necessary and appropriate because the Committee's primary counsel, Paul Hastings, LLP ("Paul Hastings") represents certain of the Financial Party Targets (or their affiliates) in matters unrelated to the Title III Cases.

10. On April 26, 2019, the Court approved the Joint Prosecution Stipulation. In connection with the prosecution of such claims or causes of action, the Oversight Board agreed to the appointment of the members of the Special Claims Committee of the Oversight Board ("Special Claims Committee"), on the one hand, and the Committee, on the other hand, as co-trustees and co-plaintiffs with respect to the Co-Plaintiff Adversary Proceedings.

11. As set forth in the Engagement Agreement dated April 30, 2019, GJB was retained by and authorized to represent the Committee as special litigation counsel and assist the Committee and the Special Claims Committee regarding investigation and pursuit of potential claims against certain Financial Party Targets.

12. On April 30, 2019, the Committee filed the *Application for Order Pursuant to Bankruptcy Code Section 1103(a) and Local Bankruptcy Rule 2014-1(e) Authorizing Employment and Retention of Genovese Joblove & Battista, P.A. as Special Litigation Counsel to Official Committee of Unsecured Creditors, Effective as of April 16, 2019* [Docket No. 6661] (the “GJB Employment Application”).

13. On May 31, 2019, the Court entered the *Order Authorizing Employment and Retention of Genovese, Joblove & Battista, P.A. as Special Litigation Counsel to Official Committee of Unsecured Creditors, Pursuant to Bankruptcy Code Section 1103(A) and Local Rule 2014-1(e), Effective as of April 16, 2019* [Docket No. 7181] (the “Retention Order”).

14. GJB’s retention extends to the representation of the Committee as the official committee for the HTA Title III Case, the ERS Title III Case, and the PREPA Title III Case. In particular, the Retention Order provided that “[t]he retention of GJB, as counsel to the Committee, shall be deemed to apply to the representation of the Committee if ever enlarged to include unsecured creditors of other debtors, without the need to obtain a modification of this Order.”

15. The Retention Order authorized GJB to be compensated on an hourly basis and reimbursed for actual and necessary out-of-pocket expenses pursuant to sections 316 and 317 of PROMESA, the Bankruptcy Rules, the Local Rules, and such orders as the Court may direct. The Retention Order further provides that “[p]ursuant to Bankruptcy Code section 503(b)(1), made applicable by PROMESA section 301(a), the fees and expenses of GJB shall be an administrative expense.” In addition, as provided in the Retention Order, the Committee has consented to the

Debtors' payment of GJB's allowed fees and expenses.

**C. Interim Compensation and Fee Examiner Orders**

16. On August 23, 2017, the Court entered the *Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 1150].

17. On October 6, 2017, the Court appointed a Fee Examiner in these Title III Cases (the "Fee Examiner") pursuant to the *Order Pursuant to PROMESA Sections 316 and 317 and Bankruptcy Code Section 105(a) Appointing a Fee Examiner and Related Relief* [Docket No. 1416] (the "Fee Examiner Order"). The Court appointed Brady Williamson as the Fee Examiner in the Title III Cases.

18. On October 31, 2017, the Fee Examiner filed the *Urgent Motion of the Fee Examiner to Amend the Interim Compensation Order, Including the Due Date and Hearing Date for Interim Compensation* [Docket No. 1594].

19. On November 8, 2017, the Court entered the *First Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 1715].

20. On November 10, 2017, the Fee Examiner issued a memorandum, and on January 3, 2018, the Fee Examiner issued a supplemental memorandum (together, the "Fee Examiner Guidelines") to all retained professionals in these Title III Cases providing additional guidelines in connection with the Interim Compensation Order.

21. On May 8, 2018, the Fee Examiner filed the *Motion of the Fee Examiner to Amend the Fee Examiner Order with Respect to the Scope of the Fee Examiner's Authority in the Interest of Administrative Efficiency* [Docket No. 3032] (the "Motion to Amend the Fee Examiner Order").

22. On May 23, 2018, the Oversight Board and the Puerto Rico Fiscal Agency and Financial Authority (“AAFAF”) filed a *Joint Motion for Entry of an Order Further Amending the Interim Compensation Order* [Docket No. 3133].

23. On June 6, 2018, the Court entered the Interim Compensation Order [Doc. No. 3269], and in accordance therewith, GJB and other professionals retained in these Title III Cases were authorized to serve upon the parties identified therein (the “Notice Parties”) monthly fee statements (the “Monthly Fee Statements”).

24. Pursuant to the Interim Compensation Order, the Notice Parties have ten (10) days from the date of service of the Monthly Fee Statement to object to the amounts requested. If no objection is filed prior to expiration of the objection period, the Commonwealth is authorized to pay the respective professionals 90% of the fees and 100% of the expenses sought in each Monthly Fee Statement.

25. On June 20, 2018, the Court entered the *First Amended Order Pursuant to PROMESA Sections 316 and 317 and Bankruptcy Code Section 105(A) Appointing a Fee Examiner and Related Relief* [Docket No. 3324] (the “Amended Fee Examiner Order”).

26. On June 26, 2019, the Court entered the *Order Imposing Additional Standards: Rate Increases and the Retention of Expert Witnesses or Other Sub-Retained Professionals* [Docket No. 7678].

**D. Applications for Interim Compensation**

27. In addition to the Monthly Fee Statements, the Interim Compensation Order directed professionals to seek interim allowance and payment of compensation (including the 10% held back from Monthly Fee Statements) and expense reimbursement at 120-day intervals (each an “Interim Fee Period”) by filing with the Court and serving on the Notice Parties an application for approval and allowance of all compensation and reimbursement of expenses relating to services

rendered and expenses incurred during the preceding Interim Fee Period (*see* Interim Compensation Order at ¶2(f)).

28. On July 15, 2019, GJB filed its First Interim Fee Application for the period from April 16, 2019 through May 31, 2019 [ECF No. 7994] (the “First Interim Fee Application”). The hearing on the First Interim Fee Application was held on October 30, 2019 at 9:30 a.m.

29. On October 29, 2019, the Court entered the *Omnibus Order Awarding Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Sixth Compensation Period from February 1, 2019 through May 31, 2019* [ECF No. 9046] (the “First Interim Fee Order”). Pursuant to the First Interim Fee Order, GJB was awarded \$657,907.05 in fees and reimbursement of expenses in the amount of \$3,848.56.

30. On November 15, 2019, GJB filed its Second Interim Fee Application for the period from June 1, 2019 through September 30, 2019 [ECF No. 9213] (the “Second Interim Fee Application”). The hearing on the Second Interim Fee Application was held on March 4, 2020 at 9:30 a.m. and was continued to April 22, 2020 at 9:30 a.m.

31. On June 1, 2020, the Court entered the *Second Supplemental Omnibus Order Awarding Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Seventh Interim (June 1- September 30, 2019) and Prior Compensation Periods* [ECF No. 13296] (the “Second Interim Fee Order”). Pursuant to the Second Interim Fee Order, GJB was awarded \$1,339,434.84 in fees and reimbursement of expenses in the amount of \$43,602.27.

32. On March 16, 2020, GJB filed its Third Interim Fee Application for the period from October 1, 2019 through January 31, 2020 [ECF No. 12409] (the “Third Interim Fee Application”). The hearing on the Third Interim Fee Application was held on July 29, 2020 at 9:30 a.m. [ECF No. 12410].

33. On July 24, 2020, the Court entered the *Omnibus Order Awarding (I). Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Eighth Interim (October 1, 2019-January 31, 2020) and Prior Compensation Periods; (II) Final Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Final Fee Period* [ECF No. 13824] (the “Third Interim Fee Order”). Pursuant to the Third Interim Fee Order, GJB was awarded \$1,171,906.40 in fees and reimbursement of expenses in the amount of \$33,296.95.

34. On November 16, 2020, GJB filed its Fourth Interim Fee Application for the period from February 1, 2020 through August 31, 2020 [ECF No. 15142] (the “Fourth Interim Fee Application”).

35. On March 8, 2021, the Court entered the *Omnibus Order Awarding (I). Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Eighth Interim (June 1, 2020-September 30, 2020) and Prior Compensation Periods; (II) Final Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Final Fee Period* [ECF No. 15971] (the “Fourth Interim Fee Order”). Pursuant to the Fourth Interim Fee Order, GJB was awarded \$887,215.80 in fees and reimbursement of expenses in the amount of \$54,671.58.

### **COMPENSATION AND REIMBURSEMENT REQUEST**

36. By this Application, GJB seeks an order authorizing (a) allowance of interim compensation for professional services rendered to the Committee during the Application Period in the aggregate amount of \$499,302.23 and (b) allowance of reimbursement of actual and necessary expenses incurred by GJB in the aggregate amount of \$31,381.55. These amounts were for legal services provided to the Committee in connection with the Commonwealth Title III case.

37. During the Application Period, GJB attorneys and paraprofessionals expended a total of 1,077.30 hours for which compensation is requested. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the Committee.

38. The Committee has approved the amounts requested by GJB for services performed and expenses incurred in each of the monthly statements submitted to the Notice Parties as outlined in the Interim Compensation Order.

39. During the Application Period, GJB submitted five (5) Monthly Fee Statements. The first Monthly Fee Statement for the period from September 1, 2020 through September 30, 2020 was submitted and served on the Notice Parties on December 17, 2020 (the “First Monthly Fee Statement”) a copy of which is attached hereto as Schedule 2. The objection deadline for the First Monthly Fee Statement was December 28, 2020.

40. A second Monthly Fee Statement for the period from October 1, 2020 through October 31, 2020 was submitted and served on the Notice Parties on February 2, 2021 (the “Second Monthly Fee Statement”) a copy of which is attached hereto as Schedule 2. The objection deadline for the Second Monthly Fee Statement was February 12, 2021.

41. A third Monthly Fee Statement for the period from November 1, 2020 through November 30, 2020 was submitted and served on the Notice Parties on January 29, 2021 (the “Third Monthly Fee Statement”) a copy of which is attached hereto as Schedule 2. The objection deadline for the Third Monthly Fee Statement was February 8, 2021.

42. A fourth Monthly Fee Statement for the period from December 1, 2020 through December 31, 2020 (the “Fourth Monthly Fee Statement”), was submitted to the Committee on February 12, 2021, a copy of which is attached hereto as Schedule 2. The objection deadline for the Fourth Monthly Fee Statement was February 22, 2021.

43. A fifth Monthly Fee Statement for the period from January 1, 2021 through January 31, 2021 (the “Fifth Monthly Fee Statement”), was submitted to the Committee on March 15, 2021, a copy of which is attached hereto as Schedule 2. The objection deadline for the Fifth Monthly Fee Statement is March 26, 2021.

44. As of the date of the filing of this Application, GJB has received neither payment nor promises of payment from any source for services rendered during the Application Period. The amount of \$143,837.94 remains unpaid.

45. As a courtesy to the Committee and based on circumstances unique to the Title III Case, during the Application Period GJB voluntarily applied a 20% discount of its hourly rates totaling \$99,860.44. For details regarding the waived fees, please see the Certification of John H. Genovese filed concurrently herewith.

46. By this Application, GJB requests allowance of all fees and expenses incurred for services rendered during the Application Period. At this time, GJB seeks payment of (a) 100% of its fees for services invoiced during the Application Period and (b) 100% of expenses invoiced during the Application Period. The time billed by these timekeepers was reasonable, and GJB reserves the right to seek allowance and payment of these fees based on the facts and circumstances of these cases, including, without limitation, if objections are interposed to the allowance or payment of GJB’s fees and expenses.

47. There is no agreement or understanding between GJB and any other person other than the attorneys, employees, and staff of GJB, for the sharing of compensation to be received for services rendered in these cases.

48. GJB maintains computerized records, in the form of monthly statements, of the time spent by all GJB’s attorneys and paraprofessionals in connection with its representation of the Committee. The monthly statements are in the same form regularly used by GJB to bill its



clients for services rendered and include the date that the services were rendered, a detailed, and contemporaneous narrative description of the services provided, the amount of time spent for each service, and the designation of the professional who performed the service.

49. The fees charged by GJB in the Title III Case are billed in accordance with its existing billing rates and procedures in effect during the Application Period. The rates GJB charges for the services rendered by its professionals and paraprofessionals in the Title III Case are comparable to the rates GJB charges for professional and paraprofessional services rendered in comparable non-bankruptcy related matters.

50. GJB's rates are set at a level designed to fairly compensate GJB for the work of its attorneys and paraprofessionals to cover fixed and routine overhead expenses. GJB operates in a national marketplace for legal services in which rates are driven by multiple factors relating to the individual lawyer, his or her area of specialization, the firm's expertise, performance and reputation, the nature of the work involved, and other factors. Accordingly, GJB set its rates for attorneys and paraprofessionals both in the restructuring group and related litigation groups within the firm by reference to market information and market adjustments by firms considered to be industry peers. Based on this and reviews of contemporaneous time records and fee applications filed in other cases, GJB's endeavors to set the hourly rates for its attorneys and paraprofessionals at levels comparable to those of its principal competitor firms.

51. As is customary, and as permitted pursuant to paragraph 2 of the Retention Order, every year GJB reviews its rate structure and, when appropriate, adjusts its hourly rates based upon (i) the advancing seniority of its professionals and paraprofessionals, (ii) the current market for legal services, (iii) the rates charged for comparable non-bankruptcy services, and (iv) the firm's analysis of the hourly rates being charged by professionals in other law firms.

52. GJB's professional services during the Application Period required an aggregate expenditure of 1,077.30 recorded hours by GJB's attorneys and paraprofessionals, broken down as follows: partners (604.10 hours), associates (327.10 hours), and paraprofessionals (146.10 hours). During the Application Period, GJB's billing rates for attorneys rendering services in this matter ranged from \$305.00 to \$765.00 per hour. No rate increases were made in January 2021 for the incoming year.

53. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Application Period, but were not processed before the preparation of this Application, or GJB has for any other reason not sought compensation or reimbursement with respect to such services or expenses, GJB reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future application.

54. Pursuant to, and consistent with, the relevant requirements of the Guidelines, as applicable, the following exhibits are attached hereto and incorporated herein by reference:

- Exhibit A- Certification of John H. Genovese
- Exhibit B- contains disclosures regarding "customary and comparable compensation."
- Exhibit C contains a summary of GJB's timekeepers included in this Application.
- Exhibit D contains the budgets for GJB's services during the Application Period.
- Exhibit E contains (a) a summary of the compensation requested as compared to the compensation budgeted for the firm's services during the Application Period, and (b) a further breakdown of the compensation requested by project category and matter number.
- Exhibit E-1 contains summary of compensation requested by project category as compared to budget.

- Exhibit E-2 contains a summary of the expense reimbursements requested by category. An itemized schedule of all such expenses is included in GJB's monthly statements.
- Exhibit F contains a breakdown of compensation and expense reimbursement requested by Debtors and by whether the services were rendered in Puerto Rico or outside Puerto Rico.
- Schedule 1 contains a list of the professionals providing Services during the Application Period by matter.
- Schedule 2 includes the monthly fee statements covered in this Application.
- Schedule 3 includes the proposed order approving this Application.

**SUMMARY OF SERVICES PERFORMED BY GJB DURING  
THE APPLICATION PERIOD**

55. This Application is GJB's Fifth interim compensation in the Debtors Title III Cases. As with the prior fee period, during this Application Period, GJB has assisted and advised the Committee on a regular basis regarding legal matters related to the Co-Plaintiff Adversary Proceedings. GJB has continued to track deadlines, organized documents, and review the Title III Case dockets to maintain its litigation tracking spreadsheets current. In addition, GJB has reviewed various motions, applications, scheduling orders and other pleadings submitted to the Court in connection with the pending Co-Plaintiff Adversary Proceedings. Specifically, GJB has continued to monitor the progress of a number of adversary proceedings, and advise the Committee as appropriate, including without limitation, those adversary proceedings against underwriters and other financial target parties involved in the issuance of Commonwealth bonds and claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers and contractual claims. GJB has continued its representation of the Committee with respect to limited "garden-variety" avoidance actions against entities that received preferential and fraudulent transfers before the petition date. Furthermore, GJB has been involved in the representation of the

Committee in a subset of adversary proceedings seeking to recover, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued. GJB has continued working on the adversary proceedings challenging liens asserted by certain holders of HTA bonds. GJB also continued its representation of the Committee in connection with the ERS litigation which is seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds and ultra vires objection. GJB provided counsel and assistance with other issues related to the Committee's motion to participate in the GO Bond Claim Objections (and related mediation process). In the pending PREPA litigation, GJB has been involved in the 9019 Motion, including the Committee's Motion to Terminate Rule 9019 Motion and Motion to Compel Discovery relating to the termination of the 9019 motion.

56. Set forth below is a description of the professional services rendered by GJB during the Application Period broken down by project category. The following services described are not intended to be a comprehensive summary of the work performed by GJB. Detailed descriptions of all services rendered by GJB can be found in the detailed time records reflecting the services performed by GJB's professionals, the time expended by each professional, and the hourly rate of each professional, annexed to the Monthly Fee Statements attached hereto as Schedule 2 and such descriptions are incorporated herein by reference.

57. As special litigation and conflicts counsel to the Committee, GJB has jointly worked on various matters with counsel for the Oversight Board or its Special Claims Committee and has made a concerted effort to perform these services in an economic, effective, and efficient manner commensurate with the complexity and importance of the issues involved while being mindful to avoid any unnecessary or unreasonable duplication of effort with respect to any

incurrence of fees in connection with the adversary proceedings commenced under the Joint Prosecution Stipulation. As such, GJB has carefully reviewed its staffing needs on a monthly basis and taken affirmative steps to avoid charges for duplicative services. For example, the work performed by GJB was carefully assigned to appropriate professionals or paraprofessionals according to the experience and level of expertise required for each particular task. Moreover, whenever possible, GJB sought to minimize the costs of GJB's services to the Committee by utilizing talented junior attorneys and paraprofessionals to handle the more routine aspects of the assignments. In addition, a small group of the same GJB attorneys was utilized for the vast majority of the work in these Title III cases to minimize the costs of intra-GJB communication and education about the cases. Notably, as a general matter, no more than two GJB attorneys attended the various hearings held during the Application Period, thereby minimizing not only the time billed on these hearings but also the cost of travel and lodging.

58. Furthermore, to the extent appropriate, GJB sought to work closely with Paul Hastings as counsel for the Committee and Brown Rudnick LLP ("Brown Rudnick" or "Special Claims Committee Counsel") as counsel for the Financial Oversight and Management Board, acting through its counsel Proskauer Rose or the Special Claims Committee (the "Oversight Board"), as applicable, in order to eliminate unnecessary duplication and allocate tasks in an efficient manner. In order to minimize duplication, GJB continues to meet with and confer with counsel for the Oversight Board to discuss pending and potential claims and discuss a division of labor and tasks to limit duplication.

59. In sum, GJB respectfully submits that the services for which it seeks compensation in this Application were necessary for and beneficial to the Committee, and were rendered to protect, preserve, and maximize the value for unsecured creditors during the pendency of these Title III cases. Accordingly, in light of the nature and complexity of these Title III cases, GJB's

charges for professional services performed and expenses incurred are reasonable under applicable standards. For all these reasons, GJB respectfully requests that the Court grant the Application and allow interim compensation for professional services performed and reimbursement for expenses as requested.

60. For ease of reference and transparency purposes, GJB created several matter numbers for its representation of the Committee. The matter numbers are divided as follows:

Matter ID	Matter Name
001	Official Committee of Unsecured Creditors
002	PREPA Adversary Litigation
003	ERS Adversary Litigation
004	HTA Adversary Litigation
005	Kobre & Kim Report Database Doc. Review

**I. Official Committee of Unsecured Creditors of Commonwealth of Puerto Rico (Matter ID 001)**

**(a) Case Administration (Task Code B110)**

Fees: \$11,118.50

Total Hours: 55.90

61. During the Application Period, GJB reviewed and developed general case strategy and planning of litigation matters, attended to case management, and participated in meetings with Paul Hastings, Proskauer Rose, Brown Rudnick, and local counsel in Puerto Rico. In order to efficiently track deadlines, organize documents, and manage work streams, GJB created a task list and tracking chart for all adversary proceedings filed which it routinely updates to keep track of deadlines. In addition, during the Application Period, GJB held routine internal team conference calls and occasional meetings to discuss interim and long-term strategies regarding current status of the Title III cases, the Co-Plaintiff Adversary Proceedings and to manage work assignments and deadlines, while ensuring efficiencies and avoiding duplication and unnecessary overlap.

(b) **Pleadings Review (Task Code B113)**

Fees: \$46,588.50 Total Hours: 147.90

62. During the Application Period, GJB monitors the case docket for the Title III cases and applicable adversary proceedings. All daily Court filings are reviewed and analyzed. Upon the completion of the Court filing review, an internal memorandum is prepared summarizing each Court filing, upcoming hearings, and noting relevant filings which may impact a proceeding where GJB is serving as special litigation counsel to the Committee

(c) **Meeting of Creditors (Task Code B150)**

Fees: \$11,364.00 Total Hours: 19.70

63. During the Application Period, GJB attended telephone conferences, and weekly meetings, and other communications with the Committee, including preparation for such calls and meetings in order to maintain the Committee informed of the various developments in the Co-Plaintiff proceedings being handled by GJB.

(d) **Court Hearings (Task Code B155)**

Fees: \$3,345.00 Total Hours: 6.20<sup>11</sup>

(e) **Fee/Employment Applications (GJB) (Task Code B160)**

Fees: \$13,026.50 Total Hours: 45.70

64. During the Application Period, GJB prepared five (5) monthly fee statements for services rendered during the months of September, October, November, December, 2020 and January, 2021, as well as responding to inquiries from the Fee Examiner. GJB also prepared and filed its Fourth Interim Fee Application and related exhibits [Doc No. 15142].

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<sup>11</sup> The description of services in this Application is limited to those matters in which Genovese Joblove & Battista, P.A. provided five (5) or more hours of service during the Application Period.

(f) **Budgeting (Task Code B161)**

Fees: \$6,037.50 Total Hours: 10.50

65. During the Application Period, GJB reviewed Budget and staffing issues and procedures in connection with the preparation, submission and approval of same. GJB prepared monthly budgets for September, October, November, December, 2020 and January 2021, as required by the Fee Examiner and Interim Fee Orders.

(g) **General Litigation (Task Code B191)**

Fees: \$197,748.23 Total Hours: 349.00

66. During this Application Period, GJB has continued its representation as special litigation and conflicts counsel to the Committee in connection with various adversary proceedings associated with the Title III cases. GJB is currently prosecuting seven (7) adversary proceedings associated with Debtor, Commonwealth of Puerto Rico (Case No. 17-3283). In Adv. No. 19-280, GJB is seeking a judgment in excess of 4 billion dollars against numerous financial institutions and advisors whom negligently underwrote numerous bond obligations despite knowing the Commonwealth was in a state of insolvency for their financial gain (the “Underwriter Litigation”). With regard to the Underwriter Litigation, GJB is involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the defendants in the Underwriter Litigation. GJB also represents the Committee with respect to a limited “garden-variety” avoidance action [Adv. Proc. No. 19-279] against Eastern America Insurance Agency, Inc. whom received preferential and fraudulent transfers before the petition date. Additionally, GJB is prosecuting a subset of adversary proceedings to recover fraudulent transfers of approximately \$9 billion dollars in general obligation bonds issued by the Commonwealth [Adv. Proc. Nos. 19-281, 19-282, 19-283, and 19-288] (the “Clawback Litigation”). Also, in Adv. No. 19-297, GJB is challenging the validity, enforceability and extent of alleged pre-petition liens of



the Commonwealth's general obligation and guaranteed bonds (the "GO Lien Challenges"). In connection with the foregoing, GJB has been working with Committee and Special Claims Committee counsel and monitoring the establishment and extension of Case Management Procedures and Approval of Settlements related to those litigation matters it is handling. GJB has also provided, from time-to-time, additional assistance to Committee counsel with respect to litigation matters within GJB's subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters. GJB has continued its representation of the Committee in certain adversary cases associated with Debtor Puerto Rico Electric Power Authority ("PREPA"); Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS"); and Puerto Rico Highways and Transportation Authority ("HTA") as further described below. Those adversary proceedings include: (A) an adversary proceeding against numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (B) three adversary proceedings involving or relating to the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. Nos. 19-388-LTS, 20-114-LTS and 20-115-LTS]. Additionally, GJB is involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings. GJB also represents the Committee with respect to a limited "garden-variety" avoidance action [Adv. Proc. No. 19-279] against Eastern America Insurance Agency, Inc. whom received preferential and fraudulent transfers before the petition date. In connection with the foregoing, GJB has been working with Committee and Special Claims Committee counsel and monitoring the establishment and extension of Case Management Procedures and Approval of Settlements related to those litigation matters it is handling. GJB has also provided, from time-to-

time, additional assistance to Committee counsel with respect to litigation matters within GJB's subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters. Furthermore, GJB has been involved in the representation of the Committee in a subset of adversary proceedings seeking to recover, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288] and a proceeding challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. GJB also continued its representation of the Committee in connection with the ERS litigation which is seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds Adv. Proc. No. 19-367 and *ultra vires* objection.

## **II. PREPA (Matter ID 002)**

### **(a) Case Administration (Task Code B110)**

Fees: \$3,408.00 Total Hours: 16.00

67. During the Application Period, GJB continued to monitor the case and review pleadings and deadlines associated with the PREPA RSA Motion, 9019 Motion, including orders, hearings, briefing schedules, and objections thereto. Additionally, GJB, reviewed pending tolling agreement deadlines.

### **(b) Meeting of Creditors (Task Code B150)**

Fees: \$5,282.50 Total Hours: 9.50

### **(c) Budgeting (Task Code B161)**

Fees: \$632.50 Total Hours: 1.10

### **(d) General Litigation (Task Code B191)**

Fees: \$166,564.00 Total Hours: 339.20

68. During the Application Period, GJB reviewed and analyzed various pleadings relating to the pending litigation of the 9019 Motion, including the Committee's Motion to Terminate Rule 9019 Motion and Motion to Compel Discovery relating to the termination of the 9019 motion. GJB paralegals prepared, reviewed and analyzed prepared summons, service and notices. GJB continued its representation of the Committee in certain adversary cases pursuing the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS].

Additionally, during the Application Period, GJB prepared a two-count adversary complaint on behalf of the Committee seeking a declaration as to PREPA's sole right to pursue certain claims. The Committee also sought an injunction to prohibit the prosecution of the contested claims because it would interfere with the Title III centralized claims resolution process, frustrate the confirmation of a viable plan of adjustment, and result in a material diminution of recoveries to similarly situated creditors [Adv. Pro. No. 20-00014-LTS]. GJB is also defending the Committee's interest in an adversary proceeding involving a complaint for declaratory judgment alleging that the claims asserted by the Oversight Board and Committee in Adv. Pro. 19-388-LTS are not assets of the estate [Adv. Pro. No. 20-00015-LTS].

(e) Meetings of and Communications with Board (Task Code B260)  
Fees: \$1,860.00 Total Hours: 3.30

### **III. ERS (Matter ID 003)**

(a) Case Administration (Task Code B110)  
Fees: \$4,407.00 Total Hours: 22.60

(b) Other Contested Matters (Task Code B190)  
Fees: \$1,552.50 Total Hours: 2.70

(c) General Litigation (Task Code B191)  
Fees: \$25,964.00 Total Hours: 47.10

69. During the Application Period, GJB continued its work representing the Committee in connection with the ERS Bond adversaries [Adv. Proc. Nos. 19-356, 19-357, 19-359, 19-361 and 19-367]. GJB represents the Committee with respect to count I of the recovery actions and has been handling the *ultra vires* issues as they relate to count I of the recovery actions and scheduling orders regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues. Additionally, GJB has tracked the Committee's omnibus objection to the claims or ERS bondholders, discovery and summary judgment briefing on the lien scope and *ultra vires* issues with respect to the ERS bonds, as well as lift stay issues to the extent they impact the ERS Bond litigation.

70. Additionally, GJB has reviewed and analyzed motions regarding briefing and litigation schedules; pending discovery and pleadings related to the bonds issued by ERS. GJB has also spent time reviewing and calendaring deadlines and hearings related to the ERS litigation.

**IV. HTA (Matter ID 004)**

(a) General Litigation (Task Code B191)  
Fees: \$403.50 Total Hours: 0.90

71. During the Application Period, GJB prepared and reviewed various pleadings regarding the stay relief motion and the order on same. GJB has been involved and continued to monitor adversary proceeding challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. GJB also spent time reviewing and calendaring deadlines and hearings related to the HTA litigation.

**V. Kobre & Kim Report Database Doc Review (Matter ID 005)- N/A**

72. During the Application Period there was no time billed in this matter.

### **ATTENDANCE AT HEARINGS**

73. In accordance with the presumptions set forth in the *Order on Fee Examiner's Motion to Impose Presumptive Standards and Timeliness Requirements for Professional Fee Applications* [Docket No. 3932] (the "Presumptive Standards Order"), GJB provides the following summary regarding the attendance of GJB's professionals at Court hearings:

- SEPTEMBER 15, 2020: John Arrastia attended the September 15, 2020 omnibus hearing;
- OCTOBER 28, 2020: John Arrastia attended the October 28, 2020 Omnibus Hearing to be heard in connection the Committee's Joinder to the Motion to Appoint Examiner.
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### **ACTUAL AND NECESSARY DISBURSEMENTS**

74. As set forth in Exhibit D-2 hereto, GJB disbursed \$31,381.55 as expenses incurred in providing professional services during the Application Period.

75. The time constraints imposed by the circumstances of the matters handled by GJB during the Application Period required its attorneys and other employees, at times, to devote substantial time during the evenings and on weekends to perform legal services on behalf of the Committee. These extraordinary services were essential to meet deadlines, timely respond to inquiries on a daily basis, and satisfy the Committee's needs and demands. Attorneys and other GJB employees who worked late in the evenings or on weekends were reimbursed for their reasonable meal and transportation costs in accordance with the Local Rules and firm policy. GJB's regular practice is not to include components for those charges in overhead when establishing billing rates, but rather to charge its clients for these and all other out-of-pocket disbursements incurred during the regular course of the provision of legal services.

76. GJB believes the rates for charges incurred are the market rates that the majority of law firms charge clients for such services. In addition, GJB believes that such charges are in

accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

**REQUESTED COMPENSATION SHOULD BE ALLOWED**

77. Section 316 of PROMESA provides for the compensation of professionals. Specifically, section 316 provides that a court may award a professional employed by a committee under section 1103 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered . . . and reimbursement for actual, necessary expenses." PROMESA

§ 316(a). Section 316 also sets forth the criteria for the award of such compensation and reimbursement:

- (a) In determining the amount of reasonable compensation to be awarded to a professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including:
  - (i) the time spent on such services;
  - (ii) the rates charged for such services;
  - (iii) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this chapter;
  - (iv) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
  - (v) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the restructuring field; and
  - (vi) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title or title 11, United States Code.

PROMESA § 316(c). Further, section 317 of PROMESA provides that “a committee . . . may apply to the court not more than once every 120 days . . . for such compensation for services rendered . . . .”

78. In the instant case, GJB respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, believed to be necessary for and beneficial to the Committee, the Debtors, and their stakeholders and were rendered to protect, preserve, and maximize value for unsecured creditors during the pendency of the Title III Cases. The services rendered to the Committee were performed in an economic, effective, and efficient manner commensurate with the complexity and importance of the issues involved. The results obtained to date have benefited not only the Committee but also the Debtors, their stakeholders, and other interested parties. Accordingly, the compensation requested herein is reasonable in light of the nature, extent, and value of such services to the Committee, the Debtors, and all parties in interest.

79. The work conducted was carefully assigned to appropriate professionals or paraprofessionals according to the experience and level of expertise required for each particular task. Whenever possible, GJB sought to minimize the costs of GJB’s services to the Committee by utilizing talented junior attorneys and paraprofessionals to handle the more routine aspects of the assignments. A small group of the same GJB attorneys was utilized for the vast majority of the work in order to minimize the costs of intra-GJB communication and education about the Title III Cases. As demonstrated by this Application, GJB spent its time economically and without unnecessary duplication. Accordingly, approval of the compensation sought herein is warranted.

### **NOTICE**

80. In accordance with the Interim Compensation Order, GJB will provide notice of

this Application to (i) the attorneys for the Oversight Board, Proskauer Rose LLP and O'Neill & Borges LLC; (ii) the attorneys for the Puerto Rico Fiscal Agency and Financial Advisory Authority, O'Melveny & Myers LLP and Marini Pietrantonì Muñiz LLC; (iii) the Office of the United States Trustee for the District of Puerto Rico; (iv) the attorneys for the Official Committee of Retired Employees, Jenner & Block LLP and Bennazar, García & Milián, C.S.P.; (v) the Puerto Rico Department of Treasury; (vi) the Fee Examiner, Brady Williamson; and (vii) counsel to the Fee Examiner, Godfrey & Kahn, S.C. and EDGE Legal Strategies, PSC. In addition, the notice of hearing with respect to this Application will be served on all parties that have filed a notice of appearance in the Title III Cases.

### **CONCLUSION**

**WHEREFORE**, GJB respectfully requests entry of an order, substantially in the form attached hereto as Schedule 3, (i) allowing interim compensation for professional services rendered during the Application Period in the amount of \$499,302.23, representing 100% of the fees billed during the Application Period (after taking into account the 20% reduction of fees in the amount of \$399,441.79 and reimbursement of \$31,381.55, representing 100% of the actual and necessary expenses incurred during the Application Period (ii) authorizing and directing the Debtors' payment of the fees allowed (net of credits for fee reductions) plus 100% of the expenses allowed and any amounts paid by the Debtors pursuant to the Interim Compensation Order, (iii) allowing such compensation and payment for professional services rendered and reimbursement of actual and necessary expenses incurred be without prejudice to GJB's right to seek such further compensation and/or payment for the full value of services performed and expenses incurred, and (iv) granting GJB such other and further relief as is just.



Dated: March 15, 2021.

/s/ John H. Genovese

GENOVESE JOBLOVE & BATTISTA, P.A.

John H. Genovese, Esq. (*Pro Hac Vice*)

John Arrastia, Esq. (*Pro Hac Vice*)

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**In re:  
MANAGEMENT BOARD FOR PUERTO RICO,**

**PROMESA  
Title III**

**as representative of**

**No. 17 BK 3283-LTS**

**THE COMMONWEALTH OF PUERTO RICO, *et al.*,**

**(Jointly Administered)**

**Debtors.<sup>1</sup>**

\_\_\_\_\_/

**CERTIFICATION OF JOHN H. GENOVESE, ESQ. IN SUPPORT OF FIFTH INTERIM  
FEE APPLICATION OF GENOVESE JOBLOVE & BATTISTA, P.A., AS SPECIAL  
LITIGATION COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS, FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES  
FOR PERIOD FROM SEPTEMBER 1, 2020 THROUGH JANUARY 31, 2021**

I, John H. Genovese, certify that the following is true to the best of my knowledge information, and belief:

1. I am an attorney and shareholder of the law firm of Genovese Joblove & Battista, P.A. (“GJB”), with four offices in Florida located at 100 SE 2<sup>nd</sup> Street, Suite 44<sup>th</sup> Floor, Miami, FL 33131 (“Miami”); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 (“Ft. Lauderdale”), Edison Theatre Building, 1533 Hendry Street, Suite 301 Fort Myers, FL 33901 (“Fort Myers”); and 100 N. Tampa Street, Suite 2600, Tampa, Florida (“Tampa”). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

<sup>1</sup> The Debtors in these jointly-administered PROMESA title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

2. I am admitted to practice law in the state of Florida. By order dated April 16, 2019, I was admitted to appear *Pro Hac Vice* in the Debtors Title III Cases [Docket No. 6330].

3. I am duly authorized to make this Certification on behalf of GJB. The facts set forth in this Certification are based upon my personal knowledge, my discussions with other GJB attorneys, and the review of GJB's client/matter records by me or other GJB attorneys acting under my supervision and direction.

4. In accordance with (a) Local Bankruptcy Rule 2016-1 (the "Local Guidelines"), (b) Appendix B of the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, effective as of November 1, 2013 (the "U.S. Trustee Guidelines"), and (c) the *Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals entered June 6, 2018* (the "Interim Compensation Order"), this Certification is made with respect to the *Fifth Interim Application of Genovese Joblove & Battista, P.A., as Special Litigation Counsel to Official Committee of Unsecured Creditors, for Services Rendered and Reimbursement of Expenses for the Period from September 1, 2020 through January 31, 2021* (the "Application").<sup>2</sup>

5. Pursuant to section (a)(4) of the Local Guidelines, I hereby certify that I have read the Application and, to the best of my knowledge, information, and belief, formed after reasonable inquiry, (a) the compensation and reimbursement of expenses sought in the Application conforms with the Bankruptcy Code, the Bankruptcy Rules, the U.S. Trustee Guidelines, and the Local Rules, (b) the compensation and reimbursement of expenses are billed at rates no less favorable to the Debtors than those customarily employed by GJB generally (taking into consideration that GJB employs a variety of fee arrangements with its clients, including hourly fees, contingency fees and hybrid fees involving reduced hourly rates and reduced contingency fee percentages) and billed in

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<sup>2</sup> Capitalized terms used herein shall have the same meanings given to them in the Application.

accordance with the Engagement Letter and Retention Order; and (c) in providing a reimbursable services, GJB does not make a profit on that service, whether the service is performed by GJB in-house or through a third party.

6. In accordance with the Engagement Letter and Retention Order, GJB agreed to take a voluntary fee reduction equal to 20%, which results in a reduction in the amount of \$99,860.44 in the Application. GJB seeks allowance of all of its fees incurred during the Application Period in the amount of \$399,441.79, to the extent such amount has not been paid before the hearing scheduled on this Application.

7. GJB provides the following response to the request for information set forth in the U.S. Trustee Guidelines:

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees, or terms for services pertaining to this engagement that were provided during the Application Period?

Response: Yes. As a courtesy to the Committee and based on circumstances unique to the Title III Case, during the Application Period, GJB agreed to a voluntary reduction of its fees by an amount equal to 20% of the total fees sought to be paid, which reduction totals \$99,860.44.

Question: If the fees sought in this application as compared to the fees budgeted for the Application Period are higher by 10% or more, did you discuss the reasons for the variation with the client?

Response: The fees were below the budgeted amount, therefore the request is not applicable.

Question: Have any of the professionals included in this application varied their hourly rate based on the geographic location of the bankruptcy case?

Response: No.

Question: Does the application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

Response: The Application includes approximately 16.80 hours and associated fees of approximately \$6,175.00 related to preparing, reviewing, and revising GJB's fee statements.

Question: Does this application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

Question: If the application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation consistent with ABA Formal Ethics Opinion 11-458?

Response: No rate increases have occurred since the retention date.

8. I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Executed this 15<sup>th</sup> day of March, 2021

/s/ John H. Genovese

John H. Genovese

GENOVESE JOBLOVE & BATTISTA, P.A.

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**EXHIBIT B**

**CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES**

(See Guidelines ¶ C.3. for definitions of terms used in this Exhibit.)

CATEGORY OF TIMEKEEPER (using categories already maintained by the firm)	BLENDED HOURLY RATE		
	NON- BANKRUPTCY BLENDED HOURLY RATE	GJB BLENDED HOURLY RATE <sup>1</sup>	GJB BLENDED HOURLY RATE (AFTER 20% REDUCTION) <sup>2</sup>
Partner	\$506	\$593.70	\$474.90
Counsel	N/A	N/A	N/A
Associate	\$306	\$344.28	\$275
All timekeepers aggregated	\$424	\$463.47	\$370.78

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<sup>1</sup> The calculation of GJB's Blended Hourly Rate does not take into account GJB's agreement to reduce its fees by an amount equal to 20% of its total hourly fees.

<sup>2</sup> For illustrative purposes only.

**EXHIBIT C**

**SUMMARY OF TIMEKEEPERS INCLUDED IN THIS APPLICATION**

Name	Title or Position	Department, Group, or Section	Date of First Admission	Fees Billed in this Application	Hours Billed in this Application	Hourly Rate Billed		Number of Rate Increases Since Case Inception
						In this Application	In Fourth Interim Application	
Arrastia, John	Partner	Litigation	1996	\$157,895.00	274.60	\$575.00	\$575.00	0
Friedman, Michael A.	Partner	Bankruptcy	2009	\$1,705.00	3.10	\$550.00	\$550.00	1
Gayo-Guitian, Mariaelena	Partner	Bankruptcy	1989	\$4,945.00	8.60	\$575.00	\$575.00	0
Genovese, John H.	Partner	Bankruptcy	1979	\$101,668.50	132.90	\$765.00	\$765.00	1
Suarez, Jesus M.	Partner	Bankruptcy	2008	\$92,450.00	184.90	\$500.00	\$500.00	1
		Total Partner:		\$358,663.50	604.10			
Rosner, Jeremy S.	Associate	Litigation	2019	\$2,836.50	9.30	\$305.00	N/A	
Castaldi, Angelo	Associate	Litigation	2015	\$60,678.23	161.80	\$375.00	\$375.00	1
Kalbac, Patrick T.	Associate	Litigation	2018	\$2,511.00	8.10	\$310.00	N/A	0
Joyce A. Delgado	Associate	Litigation	2017	\$46,588.50	147.90	\$315.00	\$315.00	0
		Total Associate:		\$112,614.23	327.10			
Hopkins, Colleen	Paralegal			\$4,270.50	21.90	\$195.00	\$195.00	0
Sardina, Jessey	Paralegal			\$60.00	0.80	\$75.00	\$75.00	0
Zamora, Johanna	Paralegal			\$22,464.00	115.20	\$195.00	\$195.00	0
Esser, Carolyn	Paralegal			\$1,230.00	8.20	\$150.00	\$150.00	0
		Total Paraprofessional:		\$28,024.50	146.10			
	Total:			\$499,302.23	1,077.30			
	Blended Rate:			\$463.47				
	Blended Rate Excluding Paraprofessionals:			\$506.09				

**EXHIBIT D**

**BUDGET AND STAFFING PLAN**



**EXHIBIT D-1**

**BUDGETS FOR:**

**September 2020**

**October 2020**

**November 2020**

**December 2020**

**January 2021**

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)  
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel  
to the Official Committee Of Unsecured Creditors  
Of The Commonwealth Of Puerto Rico, *et al.*

**BUDGET**

**Period Covered:** September 1, 2020 through September 30, 2020<sup>1</sup>

U.S. Trustee Task Code and Project Category	Estimated Hours for Period September 1, 2020 through September 30, 2020
B110 Case Administration  <i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i>	30
B112 General Creditor Inquiries	0
30B113 Pleadings Review  <i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i>	20

<sup>1</sup> Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no new plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed budget has been revised to account for the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto, (as amended and modified by subsequent orders) with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee.

B120 Asset Analysis and Recovery	0
B130 Asset Disposition	0
B140 Relief from Stay / Adequate Protection Proceedings	0
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	20
<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee.</i></p>	20
<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	20
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	2

<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	<p>2</p>
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	<p>3</p>
<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers as well as requests for settlement that are impacted by such claims. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	<p>15</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>

<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the Title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. Currently, the disputes in which GJB has primary responsibility are limited in scope due to the stay orders in effect.</i></p>	<p>25</p>
<p>191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)</p> <p><i>Notes: GJB anticipates the lifting of the stay of litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene. The Defendants have also sought to permit full intervention and consolidation. GJB anticipates responses to these efforts and further expects to prepare for the imminent commencement of litigation and discovery.</i></p> <p><i>GJB anticipates the limited participation in the PREPA main case regarding motions related to the RSA, to the extent any conflict exists</i></p> <p><i>GJB anticipates the potential for discovery related to the acts and omissions concerning settling parties to the PSA</i></p> <p><i>GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to limited issues excepted from the Stay or pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto</i></p> <p><i>GJB anticipates continued prosecution of causes of action with the Oversight Board/Special Claims Committee regarding any conflicts regarding prosecution of the ERS lien challenges as modified by the ERS Scheduling Order.</i></p>	<p>245</p>

<p><i>GJB anticipates additional research and analysis regarding potential claims against third parties arising from the PSA</i></p> <p><i>This task code includes time spent on litigation matters, including all adversary proceedings. We anticipate that work under this task code will including (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues. Currently, many of these matters are stayed pending confirmation pursuant to Court orders in effect.</i></p>	
<p>B195 Non-Working Travel<sup>2</sup></p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i></p>	0
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	10
<p>B220 Employee Benefits/Pensions</p>	0
<p>B230 Financing / Cash Collections</p>	0

<sup>2</sup> The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

B231 Security Document Analysis	0
<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	20
B261 Investigations	0
<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	10
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's anticipated filing of an amended Commonwealth plan of adjustment and disclosure statement, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	25

<p>B420 Restructurings</p> <p><i>Notes: This task code includes time spent on general restructuring matters, including an anticipated amendment Commonwealth Plan of Adjustment and Disclosure Statement, and matters related to the pending PREPA RSA) and the related 9019 motion.</i></p> <p><i>GJB anticipates continued involvement in the these matters to the extent that Paul Hastings is conflicted from the representation</i></p>	<p>25</p>
<b>TOTAL HOURS</b>	<b>492</b>
<b>TOTAL ESTIMATED FEE<sup>3</sup></b>	<b>\$253,414.44</b>
<b>MINUS 20% REDUCTION</b>	<b>\$50,682.89</b>
<b>TOTAL ESTIMATED FEE (NET OF REDUCTION)</b>	<b>\$202,731.55</b>

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<sup>3</sup> Assumes Blended Rate of \$515.07



**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)  
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

**Period Covered:** September 1, 2020 through September 30, 2020

**A. Adversary Proceedings Against Financial Parties, Fuel Oil Defendants, and Other Proceedings**

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two (2) separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS].

Pursuant to the Order entered on December 10, 2019, the litigation in Adv. Proc. No. 19-00388 has been stayed through August 17, 2020 at which time a joint status report was issued. The Defendants responded and the issues are being briefed for hearing on September 16, 2020. These proceedings are not subject to the Stay Order. The Parties intend to submit a Joint Status Report to the Court indicating the lifting of the stay with the intent of re-commencing litigation. The remaining issue is the intervention of the Marerro Class Action Plaintiffs.

The stay relating to Adv. Proc. No. 19-280 was set to expire in April 2020, but the March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto* stays the proceedings pending a decision on confirmation. GJB is also involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings.

GJB is also researching, analyzing, and evaluating additional claims that may be asserted by the Committee, including additional issues regarding settling bondholders that may result in litigation arising from anticipated confirmation issues.

**1. Staffing Plan**

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period September 1, 2020 through September 30, 2020</b>	<b>Average hourly rate for period September 1, 2020 through September 30, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	2	\$680	\$544
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300

<b>Paraprofessionals</b>	2	\$195	\$156
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2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period September 1, 2020 through September 30, 2020</b>
B191 General Litigation	220
<b>TOTAL HOURS</b>	<b>220</b>

**B. Garden-Variety Avoidance Actions**

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

On June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On August 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*”

1. Staffing Plan

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period September 1, 2020 through September 30, 2020</b>	<b>Average hourly rate for period September 1, 2020 through September 30, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	2	\$575	\$460
<b>Partner (10+ Years)</b>	2	\$500	\$400
<b>Associate</b>	2	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period September 1, 2020 through September 30, 2020</b>
B191 General Litigation	10
<b>TOTAL HOURS</b>	<b>10</b>

**C. Currently Stayed Co-Plaintiff Adversary Proceedings**

The Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee as to certain Adversary Proceedings. GJB represents the Committee as Special Litigation counsel in a subset of these adversary proceedings. Pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto the Court extended the stay. These matters are identified as follows:

- Four adversary proceedings seeking, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288]. These matters are stayed pending the decision on the Confirmation of the Amended Plan of Adjustment; and

- One adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. These matters remain stayed until such time as the Court orders the stay lifted or a plan of adjustment is confirmed for HTA.

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of April other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

Also, on December 19, 2019, Judge Swain approved a briefing and hearing schedule with respect to motion to dismiss practice related to the GO Lien Challenge. This was stayed pending confirmation of the Amended Plan, pursuant to March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto*. GJB's involvement in the GO Lien Challenge is limited to one adversary listed below.

- One adversary proceeding challenging liens asserted by certain holders of GO bonds Adv. Proc. No. 19-297].

GJB's involvement in the GO Lien Challenge is expected to be minimal.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period September 1, 2020 through September 30, 2020	Average hourly rate for period September 1, 2020 through September 30, 2020 (net of 20% reduction)
<b>Partner (20+ Years)</b>	2	\$575	\$460
<b>Partner (10+ Years)</b>	2	\$500	\$400
<b>Associate</b>	2	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period September 1, 2020 through September 30, 2020
B191 General Litigation	10
<b>TOTAL HOURS</b>	<b>10</b>

**D. ERS Lien Co-Plaintiff Adversary Proceedings**

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the August 25<sup>th</sup>, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking declarations that the pertinent ERS bonds were issued *ultra vires* and, thus, are null and void, *i.e.*, Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361 were unstayed. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

In connection with the *ultra vires* objection to the ERS Bonds, GJB anticipates it will continue to be involved in certain discovery and briefing issues on a limited basis during the month of April.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period September 1, 2020 through September 30, 2020	Average hourly rate for period September 1, 2020 through September 30, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period September 1, 2020 through September 30, 2020
B191 General Litigation	5
<b>TOTAL HOURS</b>	<b>5</b>

**E. Contested Matters.**

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); proceedings relating to terminating the PREPA RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA RSA, especially as it relates to conflict issues.

**1. Staffing Plan**

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period September 1, 2020 through September 30, 2020</b>	<b>Average hourly rate for period September 1, 2020 through September 30, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	3	\$645	\$516
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

**2. Sub-Budget**

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period September 1, 2020 through September 30, 2020</b>
B190 Other Contested Matters	25
<b>TOTAL HOURS</b>	<b>25</b>

**GENERAL STAFFING PLAN**

**Period Covered:** September 1, 2020 through September 30, 2020<sup>4</sup>

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period September 1, 2020 through September 30, 2020</b>	<b>Average hourly rate for period September 1, 2020 through September 30, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	5	\$615	\$492
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

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<sup>4</sup> Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)  
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel  
to the Official Committee Of Unsecured Creditors  
Of The Commonwealth Of Puerto Rico, *et al.*

### **BUDGET**

**Period Covered:** October 1, 2020 through October 31, 2020<sup>1</sup>

U.S. Trustee Task Code and Project Category	Estimated Hours for Period October 1, 2020 through October 31, 2020
<p>B110 Case Administration</p> <p><i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i></p>	30
B112 General Creditor Inquiries	0
<p>30B113 Pleadings Review</p> <p><i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i></p>	20

<sup>1</sup> Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no new plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed budget has been revised to account for the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto, (as amended and modified by subsequent orders) with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee.



B120 Asset Analysis and Recovery	0
B130 Asset Disposition	0
B140 Relief from Stay / Adequate Protection Proceedings	0
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	25
<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee.</i></p>	20
<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	20
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	2

<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	<p>2</p>
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	<p>3</p>
<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers as well as requests for settlement that are impacted by such claims. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	<p>15</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>

<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the Title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. Currently, the disputes in which GJB has primary responsibility are limited in scope due to the stay orders in effect.</i></p>	<p>25</p>
<p>191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)</p> <p><i>Notes: GJB anticipates the lifting of the stay of litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene. The Defendants have also sought to permit full intervention and consolidation. Putative intervenors have filed a declaratory judgment action against the UCC as co-trustee of PREPA. GJB anticipates responses to these efforts and further expects to prepare for the commencement of litigation and discovery.</i></p> <p><i>GJB anticipates the limited participation in the PREPA main case regarding motions related to the RSA, to the extent any conflict exists</i></p> <p><i>GJB anticipates continued prosecution of causes of action with the Oversight Board/Special Claims Committee regarding any conflicts regarding prosecution of the ERS lien challenges as modified by the ERS Scheduling Order.</i></p> <p><i>GJB anticipates additional research and analysis regarding potential claims against third parties arising from the PSA</i></p> <p><i>GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to limited issues excepted from the Stay or pursuant to the March 10, 2020 Final Order</i></p>	<p>245-420</p>

<p><i>Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto</i></p> <p><i>This task code includes time spent on litigation matters, including all adversary proceedings. We anticipate that work under this task code will include (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues. Currently, many of these matters are stayed pending confirmation pursuant to Court orders in effect.</i></p>	
<p>B195 Non-Working Travel<sup>2</sup></p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i></p>	0
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	2
<p>B220 Employee Benefits/Pensions</p>	0
<p>B230 Financing / Cash Collections</p>	0

<sup>2</sup> The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

B231 Security Document Analysis	0
<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	10
B261 Investigations	0
<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	35
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's anticipated filing of an amended Commonwealth plan of adjustment and disclosure statement, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	25

<p>B420 Restructurings</p> <p><i>Notes: This task code includes time spent on general restructuring matters, including an anticipated amendment Commonwealth Plan of Adjustment and Disclosure Statement, and matters related to the pending PREPA RSA) and the related 9019 motion.</i></p> <p><i>GJB anticipates continued involvement in the these matters to the extent that Paul Hastings is conflicted from the representation</i></p>	<p>25</p>
<b>TOTAL HOURS</b>	<b>504-420</b>
<b>TOTAL ESTIMATED FEE<sup>3</sup></b>	<b>\$259,595.28 -- \$349,732.53</b>
<b>MINUS 20% REDUCTION</b>	<b>\$51,919.06 -- \$69,946.51</b>
<b>TOTAL ESTIMATED FEE (NET OF REDUCTION)</b>	<b>\$207,676.22 -- \$279,786.02</b>

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<sup>3</sup> Assumes Blended Rate of \$515.07

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)  
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

**Period Covered:** October 1, 2020 through October 31, 2020

**A. Adversary Proceedings Against Financial Parties, Fuel Oil Defendants, and Other Proceedings**

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two (2) separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS].

Pursuant to the Order entered on December 10, 2019, the litigation in Adv. Proc. No. 19-00388 has been stayed through August 17, 2020 at which time a joint status report was issued. The Defendants responded and the issues are being briefed for hearing on September 16, 2020. These proceedings are not subject to the Stay Order. The Parties intend to submit a Joint Status Report to the Court indicating the lifting of the stay with the intent of re-commencing litigation. The remaining issue is the intervention of the Marerro Class Action Plaintiffs.

The stay relating to Adv. Proc. No. 19-280 was set to expire in April 2020, but the March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto* stays the proceedings pending a decision on confirmation. GJB is also involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings.

GJB is also researching, analyzing, and evaluating additional claims that may be asserted by the Committee, including additional issues regarding settling bondholders that may result in litigation arising from anticipated confirmation issues.

**1. Staffing Plan**

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period October 1, 2020 through October 31, 2020</b>	<b>Average hourly rate for period October 1, 2020 through October 31, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	2	\$680	\$544
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300

<b>Paraprofessionals</b>	2	\$195	\$156
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2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period October 1, 2020 through October 31, 2020</b>
B191 General Litigation	220
<b>TOTAL HOURS</b>	<b>220</b>

**B. Garden-Variety Avoidance Actions**

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

On June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On August 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*”

1. Staffing Plan



Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period October 1, 2020 through October 31, 2020	Average hourly rate for period October 1, 2020 through October 31, 2020 (net of 20% reduction)
<b>Partner (20+ Years)</b>	2	\$575	\$460
<b>Partner (10+ Years)</b>	2	\$500	\$400
<b>Associate</b>	2	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period October 1, 2020 through October 31, 2020
B191 General Litigation	10
<b>TOTAL HOURS</b>	<b>10</b>

C. Currently Stayed Co-Plaintiff Adversary Proceedings

The Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee as to certain Adversary Proceedings. GJB represents the Committee as Special Litigation counsel in a subset of these adversary proceedings. Pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto the Court extended the stay. These matters are identified as follows:

- Four adversary proceedings seeking, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288]. These matters are stayed pending the decision on the Confirmation of the Amended Plan of Adjustment; and
- One adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. These matters remain stayed until such time as the Court orders the stay lifted or a plan of adjustment is confirmed for HTA.

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of April other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

Also, on December 19, 2019, Judge Swain approved a briefing and hearing schedule with respect to motion to dismiss practice related to the GO Lien Challenge. This was stayed pending confirmation of the Amended Plan, pursuant to March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto*. GJB's involvement in the GO Lien Challenge is limited to one adversary listed below.

- One adversary proceeding challenging liens asserted by certain holders of GO bonds Adv. Proc. No. 19-297].

GJB's involvement in the GO Lien Challenge is expected to be minimal.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period October 1, 2020 through October 31, 2020	Average hourly rate for period October 1, 2020 through October 31, 2020 (net of 20% reduction)
<b>Partner (20+ Years)</b>	2	\$575	\$460
<b>Partner (10+ Years)</b>	2	\$500	\$400
<b>Associate</b>	2	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period October 1, 2020 through October 31, 2020
B191 General Litigation	10
<b>TOTAL HOURS</b>	<b>10</b>

**D. ERS Lien Co-Plaintiff Adversary Proceedings**

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking, among other things, declarations on the scope of the liens

purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the August 25<sup>th</sup>, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking declarations that the pertinent ERS bonds were issued *ultra vires* and, thus, are null and void, *i.e.*, Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361 were unstayed. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

In connection with the *ultra vires* objection to the ERS Bonds, GJB anticipates it will continue to be involved in certain discovery and briefing issues on a limited basis during the month of April.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period October 1, 2020 through October 31, 2020	Average hourly rate for period October 1, 2020 through October 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period October 1, 2020 through October 31, 2020
B191 General Litigation	5
<b>TOTAL HOURS</b>	<b>5</b>

**E. Contested Matters.**

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); proceedings relating to terminating the PREPA RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA RSA, especially as it relates to conflict issues.

1. Staffing Plan

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period October 1, 2020 through October 31, 2020</b>	<b>Average hourly rate for period October 1, 2020 through October 31, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	3	\$645	\$516
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period October 1, 2020 through October 31, 2020</b>
B190 Other Contested Matters	25
<b>TOTAL HOURS</b>	<b>25</b>

**GENERAL STAFFING PLAN**

**Period Covered:** October 1, 2020 through October 31, 2020<sup>4</sup>

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period October 1, 2020 through October 31, 2020</b>	<b>Average hourly rate for period October 1, 2020 through October 31, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	5	\$615	\$492
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

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<sup>4</sup> Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)  
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel  
to the Official Committee Of Unsecured Creditors  
Of The Commonwealth Of Puerto Rico, *et al.*

### **BUDGET**

**Period Covered:** November 1, 2020 through November 30, 2020<sup>1</sup>

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2020 through November 30, 2020
B110 Case Administration  <i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i>	30
B112 General Creditor Inquiries	0
30B113 Pleadings Review  <i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i>	25

<sup>1</sup> Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no new plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed budget has been revised to account for the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto, (as amended and modified by subsequent orders) with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee.

B120 Asset Analysis and Recovery	0
B130 Asset Disposition	0
B140 Relief from Stay / Adequate Protection Proceedings	0
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	25
<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee.</i></p>	20
<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	15
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	2

<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	<p>2</p>
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	<p>3</p>
<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers as well as requests for settlement that are impacted by such claims. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	<p>15</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>



<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the Title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. Currently, the disputes in which GJB has primary responsibility are limited in scope due to the stay orders in effect.</i></p>	<p>25</p>
<p>191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)</p> <p><i>Notes: GJB anticipates the lifting of the stay of litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene. The Defendants have also sought to permit full intervention and consolidation. Putative intervenors have filed a declaratory judgment action against the UCC as co-trustee of PREPA, to which the UCC has counterclaimed. GJB anticipates responses and challenges to these efforts by other interested parties and further expects to prepare for the commencement of litigation and discovery.</i></p> <p><i>GJB anticipates the limited participation in the PREPA main case regarding motions related to the RSA 9019, to the extent any conflict exists</i></p> <p><i>GJB anticipates participation in motion practice seeking discovery and investigation into Bondholder trading practices, which could result in litigation and discovery disputes</i></p> <p><i>GJB anticipates continued prosecution of causes of action with the Oversight Board/Special Claims Committee regarding any conflicts regarding prosecution of the ERS lien challenges as modified by the ERS Scheduling Order.</i></p>	<p>245-545</p>

<p><i>GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to limited issues excepted from the Stay or pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto</i></p> <p><i>This task code includes time spent on litigation matters, including all adversary proceedings. In addition to the foregoing, we anticipate that work under this task code will include (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues. Currently, many of these matters are stayed pending confirmation pursuant to Court orders in effect.</i></p>	
<p>B195 Non-Working Travel<sup>2</sup></p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i></p>	0
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	2
<p>B220 Employee Benefits/Pensions</p>	0

<sup>2</sup> The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

B230 Financing / Cash Collections	0
B231 Security Document Analysis	0
<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	10
B261 Investigations	0
<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	35
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's anticipated filing of an amended Commonwealth plan of adjustment and disclosure statement, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	25

<p>B420 Restructurings</p> <p><i>Notes: This task code includes time spent on general restructuring matters, including an anticipated amendment Commonwealth Plan of Adjustment and Disclosure Statement, and matters related to the pending PREPA RSA) and the related 9019 motion.</i></p> <p><i>GJB anticipates continued involvement in the these matters to the extent that Paul Hastings is conflicted from the representation</i></p>	<p>25</p>
<b>TOTAL HOURS</b>	<b>504-804</b>
<b>TOTAL ESTIMATED FEE<sup>3</sup></b>	<b>\$259,595.28 -- \$414,116.28</b>
<b>MINUS 20% REDUCTION</b>	<b>\$51,919.06 -- \$82,823.26</b>
<b>TOTAL ESTIMATED FEE (NET OF REDUCTION)</b>	<b>\$207,676.22 -- \$331,293.02</b>

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<sup>3</sup> Assumes Blended Rate of \$515.07

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)  
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

**Period Covered:** November 1, 2020 through November 30, 2020

**A. Adversary Proceedings Against Financial Parties, Fuel Oil Defendants, and Other Proceedings**

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two (2) principal adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS].

Pursuant to the Order entered on December 10, 2019, the litigation in Adv. Proc. No. 19-00388 has been stayed through August 17, 2020 at which time a joint status report was issued. The Defendants responded and the issues were briefed for hearing on September 16, 2020, but not heard, and remain under advisement. The remaining issue is the intervention of the Marrero Class Action Plaintiffs. On September 14, 2020, the Committee filed a declaratory judgment and injunction action against the Marrero Class Action on these issues in Adv. Proc. No. 20-00114. That action was voluntarily dismissed on October 9, 2020 and the same claims asserted as counterclaims in the Marrero Class Action Plaintiffs’ complaint to declare its right to pursue the claims against the Fuel Oil defendants in Adv. Pro. No. 20-00115.

The stay relating to Adv. Proc. No. 19-280 was set to expire in April 2020, but the March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto* stays the proceedings pending a decision on confirmation. GJB is also involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings.

GJB is also researching, analyzing, and evaluating additional issues arising from the trading activities by certain Bondholders that may have traded on non-public information during the course of mediation. This has resulted in a limited joinder as to a motion for an investigation and may also be the basis for other investigative and analytical processes.

**1. Staffing Plan**

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period November 1, 2020 through November 30, 2020</b>	<b>Average hourly rate for period November 1, 2020 through November 30, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	2	\$680	\$544
<b>Partner</b>	2	\$525	\$420

<b>(10+ Years)</b>			
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period November 1, 2020 through November 30, 2020</b>
B191 General Litigation	220
<b>TOTAL HOURS</b>	<b>220-525</b>

**B. Garden-Variety Avoidance Actions**

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

On June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On August 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*”

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period November 1, 2020 through November 30, 2020	Average hourly rate for period November 1, 2020 through November 30, 2020 (net of 20% reduction)
<b>Partner (20+ Years)</b>	2	\$575	\$460
<b>Partner (10+ Years)</b>	2	\$500	\$400
<b>Associate</b>	2	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2020 through November 30, 2020
B191 General Litigation	10
<b>TOTAL HOURS</b>	<b>10</b>

C. Currently Stayed Co-Plaintiff Adversary Proceedings

The Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee as to certain Adversary Proceedings. GJB represents the Committee as Special Litigation counsel in a subset of these adversary proceedings. Pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto the Court extended the stay. These matters are identified as follows:

- Four adversary proceedings seeking, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288]. These matters are stayed pending the decision on the Confirmation of the Amended Plan of Adjustment; and

- One adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. These matters remain stayed until such time as the Court orders the stay lifted or a plan of adjustment is confirmed for HTA.

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of April other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

Also, on December 19, 2019, Judge Swain approved a briefing and hearing schedule with respect to motion to dismiss practice related to the GO Lien Challenge. This was stayed pending confirmation of the Amended Plan, pursuant to March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto*. GJB's involvement in the GO Lien Challenge is limited to one adversary listed below.

- One adversary proceeding challenging liens asserted by certain holders of GO bonds Adv. Proc. No. 19-297].

GJB's involvement in the GO Lien Challenge is expected to be minimal.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period November 1, 2020 through November 30, 2020	Average hourly rate for period November 1, 2020 through November 30, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2020 through November 30, 2020
B191 General Litigation	10
<b>TOTAL HOURS</b>	<b>10</b>

D. ERS Lien Co-Plaintiff Adversary Proceedings



Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the August 25<sup>th</sup>, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking declarations that the pertinent ERS bonds were issued *ultra vires* and, thus, are null and void, *i.e.*, Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361 were unstayed. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

In connection with the *ultra vires* objection to the ERS Bonds, GJB anticipates it will continue to be involved in certain discovery and briefing issues on a limited basis during the month of April.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period November 1, 2020 through November 30, 2020	Average hourly rate for period November 1, 2020 through November 30, 2020 (net of 20% reduction)
<b>Partner (20+ Years)</b>	2	\$575	\$460
<b>Partner (10+ Years)</b>	2	\$500	\$400
<b>Associate</b>	2	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2020 through November 30, 2020
B191 General Litigation	5
<b>TOTAL HOURS</b>	<b>5</b>

**E. Contested Matters.**

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); proceedings relating to terminating the PREPA RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA RSA, especially as it relates to conflict issues.

1. Staffing Plan

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period November 1, 2020 through November 30, 2020</b>	<b>Average hourly rate for period November 1, 2020 through November 30, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	3	\$645	\$516
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period November 1, 2020 through November 30, 2020</b>
B190 Other Contested Matters	25
<b>TOTAL HOURS</b>	<b>25</b>

**GENERAL STAFFING PLAN**

**Period Covered:** November 1, 2020 through November 30, 2020<sup>4</sup>

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period November 1, 2020 through November 30, 2020</b>	<b>Average hourly rate for period November 1, 2020 through November 30, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	5	\$615	\$492
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

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<sup>4</sup> Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)  
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel  
to the Official Committee Of Unsecured Creditors  
Of The Commonwealth Of Puerto Rico, *et al.*

### **BUDGET**

**Period Covered:** November 1, 2020 through November 30, 2020<sup>1</sup>

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2020 through November 30, 2020
B110 Case Administration  <i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i>	30
B112 General Creditor Inquiries	0
30B113 Pleadings Review  <i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i>	25

<sup>1</sup> Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no new plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed budget has been revised to account for the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto, (as amended and modified by subsequent orders) with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee.

B120 Asset Analysis and Recovery	0
B130 Asset Disposition	0
B140 Relief from Stay / Adequate Protection Proceedings	0
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	25
<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee.</i></p>	20
<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	15
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	2

<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	<p>2</p>
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	<p>3</p>
<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers as well as requests for settlement that are impacted by such claims. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	<p>15</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>

<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the Title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. Currently, the disputes in which GJB has primary responsibility are limited in scope due to the stay orders in effect.</i></p>	<p>25</p>
<p>191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)</p> <p><i>Notes: GJB anticipates the lifting of the stay of litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene. The Defendants have also sought to permit full intervention and consolidation. Putative intervenors have filed a declaratory judgment action against the UCC as co-trustee of PREPA, to which the UCC has counterclaimed. GJB anticipates responses and challenges to these efforts by other interested parties and further expects to prepare for the commencement of litigation and discovery.</i></p> <p><i>GJB anticipates the limited participation in the PREPA main case regarding motions related to the RSA 9019, to the extent any conflict exists</i></p> <p><i>GJB anticipates participation in motion practice seeking discovery and investigation into Bondholder trading practices, which could result in litigation and discovery disputes</i></p> <p><i>GJB anticipates continued prosecution of causes of action with the Oversight Board/Special Claims Committee regarding any conflicts regarding prosecution of the ERS lien challenges as modified by the ERS Scheduling Order.</i></p>	<p>245-545</p>

<p><i>GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to limited issues excepted from the Stay or pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto</i></p> <p><i>This task code includes time spent on litigation matters, including all adversary proceedings. In addition to the foregoing, we anticipate that work under this task code will include (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues. Currently, many of these matters are stayed pending confirmation pursuant to Court orders in effect.</i></p>	
<p>B195 Non-Working Travel<sup>2</sup></p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i></p>	0
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	2
<p>B220 Employee Benefits/Pensions</p>	0

<sup>2</sup> The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.



B230 Financing / Cash Collections	0
B231 Security Document Analysis	0
<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	10
B261 Investigations	0
<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	35
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's anticipated filing of an amended Commonwealth plan of adjustment and disclosure statement, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	25

<p>B420 Restructurings</p> <p><i>Notes: This task code includes time spent on general restructuring matters, including an anticipated amendment Commonwealth Plan of Adjustment and Disclosure Statement, and matters related to the pending PREPA RSA) and the related 9019 motion.</i></p> <p><i>GJB anticipates continued involvement in the these matters to the extent that Paul Hastings is conflicted from the representation</i></p>	<p>25</p>
<b>TOTAL HOURS</b>	<b>504-804</b>
<b>TOTAL ESTIMATED FEE<sup>3</sup></b>	<b>\$259,595.28 -- \$414,116.28</b>
<b>MINUS 20% REDUCTION</b>	<b>\$51,919.06 -- \$82,823.26</b>
<b>TOTAL ESTIMATED FEE (NET OF REDUCTION)</b>	<b>\$207,676.22 -- \$331,293.02</b>

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<sup>3</sup> Assumes Blended Rate of \$515.07

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)  
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

**Period Covered:** November 1, 2020 through November 30, 2020

**A. Adversary Proceedings Against Financial Parties, Fuel Oil Defendants, and Other Proceedings**

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two (2) principal adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS].

Pursuant to the Order entered on December 10, 2019, the litigation in Adv. Proc. No. 19-00388 has been stayed through August 17, 2020 at which time a joint status report was issued. The Defendants responded and the issues were briefed for hearing on September 16, 2020, but not heard, and remain under advisement. The remaining issue is the intervention of the Marrero Class Action Plaintiffs. On September 14, 2020, the Committee filed a declaratory judgment and injunction action against the Marrero Class Action on these issues in Adv. Proc. No. 20-00114. That action was voluntarily dismissed on October 9, 2020 and the same claims asserted as counterclaims in the Marrero Class Action Plaintiffs’ complaint to declare its right to pursue the claims against the Fuel Oil defendants in Adv. Pro. No. 20-00115.

The stay relating to Adv. Proc. No. 19-280 was set to expire in April 2020, but the March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto* stays the proceedings pending a decision on confirmation. GJB is also involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings.

GJB is also researching, analyzing, and evaluating additional issues arising from the trading activities by certain Bondholders that may have traded on non-public information during the course of mediation. This has resulted in a limited joinder as to a motion for an investigation and may also be the basis for other investigative and analytical processes.

**1. Staffing Plan**

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period November 1, 2020 through November 30, 2020</b>	<b>Average hourly rate for period November 1, 2020 through November 30, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	2	\$680	\$544
<b>Partner</b>	2	\$525	\$420

<b>(10+ Years)</b>			
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period November 1, 2020 through November 30, 2020</b>
B191 General Litigation	220
<b>TOTAL HOURS</b>	<b>220-525</b>

**B. Garden-Variety Avoidance Actions**

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

On June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On August 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*”

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period November 1, 2020 through November 30, 2020	Average hourly rate for period November 1, 2020 through November 30, 2020 (net of 20% reduction)
<b>Partner (20+ Years)</b>	2	\$575	\$460
<b>Partner (10+ Years)</b>	2	\$500	\$400
<b>Associate</b>	2	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2020 through November 30, 2020
B191 General Litigation	10
<b>TOTAL HOURS</b>	<b>10</b>

C. Currently Stayed Co-Plaintiff Adversary Proceedings

The Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee as to certain Adversary Proceedings. GJB represents the Committee as Special Litigation counsel in a subset of these adversary proceedings. Pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto the Court extended the stay. These matters are identified as follows:

- Four adversary proceedings seeking, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288]. These matters are stayed pending the decision on the Confirmation of the Amended Plan of Adjustment; and

- One adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. These matters remain stayed until such time as the Court orders the stay lifted or a plan of adjustment is confirmed for HTA.

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of April other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

Also, on December 19, 2019, Judge Swain approved a briefing and hearing schedule with respect to motion to dismiss practice related to the GO Lien Challenge. This was stayed pending confirmation of the Amended Plan, pursuant to March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto*. GJB's involvement in the GO Lien Challenge is limited to one adversary listed below.

- One adversary proceeding challenging liens asserted by certain holders of GO bonds Adv. Proc. No. 19-297].

GJB's involvement in the GO Lien Challenge is expected to be minimal.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period November 1, 2020 through November 30, 2020	Average hourly rate for period November 1, 2020 through November 30, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2020 through November 30, 2020
B191 General Litigation	10
<b>TOTAL HOURS</b>	<b>10</b>

D. ERS Lien Co-Plaintiff Adversary Proceedings

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the August 25<sup>th</sup>, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking declarations that the pertinent ERS bonds were issued *ultra vires* and, thus, are null and void, *i.e.*, Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361 were unstayed. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

In connection with the *ultra vires* objection to the ERS Bonds, GJB anticipates it will continue to be involved in certain discovery and briefing issues on a limited basis during the month of April.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period November 1, 2020 through November 30, 2020	Average hourly rate for period November 1, 2020 through November 30, 2020 (net of 20% reduction)
<b>Partner (20+ Years)</b>	2	\$575	\$460
<b>Partner (10+ Years)</b>	2	\$500	\$400
<b>Associate</b>	2	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2020 through November 30, 2020
B191 General Litigation	5
<b>TOTAL HOURS</b>	<b>5</b>

**E. Contested Matters.**

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); proceedings relating to terminating the PREPA RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA RSA, especially as it relates to conflict issues.

1. Staffing Plan

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period November 1, 2020 through November 30, 2020</b>	<b>Average hourly rate for period November 1, 2020 through November 30, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	3	\$645	\$516
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period November 1, 2020 through November 30, 2020</b>
B190 Other Contested Matters	25
<b>TOTAL HOURS</b>	<b>25</b>



**GENERAL STAFFING PLAN**

**Period Covered:** November 1, 2020 through November 30, 2020<sup>4</sup>

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period November 1, 2020 through November 30, 2020</b>	<b>Average hourly rate for period November 1, 2020 through November 30, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	5	\$615	\$492
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

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<sup>4</sup> Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)  
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel  
to the Official Committee Of Unsecured Creditors  
Of The Commonwealth Of Puerto Rico, *et al.*

### **BUDGET**

**Period Covered:** December 1, 2020 through December 31, 2020<sup>1</sup>

U.S. Trustee Task Code and Project Category	Estimated Hours for Period December 1, 2020 through December 31, 2020
<p>B110 Case Administration</p> <p><i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i></p> <p style="text-align: right;"><i>Two month trailing average <math>\pm 15.3</math></i></p>	15
B112 General Creditor Inquiries	0
<p>B113 Pleadings Review</p> <p><i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i></p> <p style="text-align: right;"><i>Two month trailing average <math>\pm 30.9</math></i></p>	25
B120 Asset Analysis and Recovery	0

<sup>1</sup> Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no new plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed budget has been revised to account for the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto, (as amended and modified by subsequent orders) with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee.

B130 Asset Disposition	0
B140 Relief from Stay / Adequate Protection Proceedings	0
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p> <p><i>Two month trailing average <math>\pm 10.2</math></i></p>	10
<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee.</i></p> <p><i>Two month trailing average <math>\pm 2.6</math></i></p>	3
<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p> <p><i>Two month trailing average <math>\pm 6.8</math></i></p>	7
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p> <p><i>Two month trailing average <math>\pm 2.1</math></i></p>	3

<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	<p>2</p>
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	<p>3</p>
<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers as well as requests for settlement that are impacted by such claims. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	<p>0</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>

<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the Title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. Currently, the disputes in which GJB has primary responsibility are limited in scope due to the stay orders in effect.</i></p> <p style="text-align: right;"><i>Two month trailing average <math>\pm 2.4</math></i></p>	10
<p>191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)</p> <p><i>Notes: GJB anticipates significant briefing and motion practice relating to the class action plaintiffs' effort to intervene and the pending declaratory judgment action against PREPA with respect to the right to proceed against the Fuel Oil Defendants. GJB anticipates responses and challenges to these efforts by other interested parties and, the stay having been lifted, further expects to prepare for the entry of a case management order and commencement of litigation and discovery.</i></p> <p><i>GJB anticipates continued prosecution of causes of action with the Oversight Board/Special Claims Committee regarding any conflicts regarding prosecution of the ERS lien challenges as modified by the ERS Scheduling Order.</i></p> <p><i>GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to those limited issues excepted from the Stay or pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto</i></p> <p><i>This task code includes all adversary proceedings, which consist of (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in</i></p>	175

<p><i>which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues. Currently, many of these matters are stayed pursuant to Court orders in effect.</i></p> <p><i>Two month trailing average <math>\pm</math> 265</i></p>	
<p>B195 Non-Working Travel<sup>2</sup></p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i></p>	0
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	2
<p>B220 Employee Benefits/Pensions</p>	0
<p>B230 Financing / Cash Collections</p>	0
<p>B231 Security Document Analysis</p>	0

<sup>2</sup> The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p> <p style="text-align: right;">Two month trailing average <math>\pm</math> 1.8</p>	<p style="text-align: right;">6</p>
<p>B261 Investigations</p>	<p style="text-align: right;">0</p>
<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p style="text-align: right;">5</p>
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's anticipated filing of an amended Commonwealth plan of adjustment and disclosure statement, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	<p style="text-align: right;">0</p>

B420 Restructurings	
<p><i>Notes: This task code includes time spent on general restructuring matters, including an anticipated amendment Commonwealth Plan of Adjustment and Disclosure Statement, and matters related to the pending PREPA RSA) and the related 9019 motion.</i></p> <p><i>GJB anticipates continued involvement in the these matters to the extent that Paul Hastings is conflicted from the representation</i></p>	
	0
<b>TOTAL HOURS</b>	<b>266</b>
<b>TOTAL ESTIMATED FEE<sup>3</sup></b>	<b>\$134,348.62</b>
<b>MINUS 20% REDUCTION</b>	<b>\$26,869.72</b>
<b>TOTAL ESTIMATED FEE (NET OF REDUCTION)</b>	<b>\$107,478.9</b>

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)  
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

**Period Covered:** December 1, 2020 through December 31, 2020

**A. Adversary Proceedings Against Financial Parties, Fuel Oil Defendants, and Other Proceedings**

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two (2) principal adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS].

Pursuant to the Order entered on December 10, 2019, the litigation in Adv. Proc. No. 19-00388 has been stayed through August 17, 2020 at which time a joint status report was issued. The Defendants responded and the issues were briefed for hearing on September 16, 2020, but not heard, and remain under advisement. The remaining issue is the intervention of the Marrero Class Action Plaintiffs. On September 14, 2020, the Committee filed a declaratory judgment and injunction action against the Marrero Class Action on these issues in Adv. Proc. No. 20-00114. That action was voluntarily dismissed on October 9, 2020 and the same claims asserted as counterclaims in the Marrero Class Action Plaintiffs’ complaint to declare its right to pursue the claims against the Fuel Oil defendants in Adv. Pro. No. 20-00115. That Counterclaim was voluntarily dismissed on November 13, 2020 as part of a negotiated resolution with the Oversight Board regarding the Committee’s limited intervention in Adv. Pro. No. 20-115. It is anticipated that the issue of the Marrero Plaintiffs’ intervention rights will be briefed in that parties’ adversary proceeding, No. 20-00115. The stay in Adv. Pro. No. 19-388 has expired and

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<sup>3</sup> Assumes Blended Rate of \$515.07



the parties are awaiting rulings the court has taken under advisement and a case management order.

The stay relating to Adv. Proc. No. 19-280 was set to expire in April 2020, but the March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto* stays the proceedings pending a decision on confirmation. GJB is also involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings.

1. Staffing Plan

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period December 1, 2020 through December 31, 2020</b>	<b>Average hourly rate for period December 1, 2020 through December 31, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	2	\$680	\$544
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period December 1, 2020 through December 31, 2020</b>
B191 General Litigation	140
<b>TOTAL HOURS</b>	<b>140</b>

**B. Garden-Variety Avoidance Actions**

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date. Casillas, Santiago & Torres LLC, the Committee’s local counsel,

represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

On June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On August 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*”

1. Staffing Plan

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period December 1, 2020 through December 31, 2020</b>	<b>Average hourly rate for period December 1, 2020 through December 31, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	2	\$575	\$460
<b>Partner (10+ Years)</b>	2	\$500	\$400
<b>Associate</b>	2	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period December 1, 2020 through December 31, 2020</b>
B191 General Litigation	10
<b>TOTAL HOURS</b>	<b>10</b>

**C. Currently Stayed Co-Plaintiff Adversary Proceedings**

The Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee as to certain Adversary Proceedings. GJB represents the Committee as Special Litigation counsel in a subset of these adversary proceedings. Pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto the Court extended the stay. These matters are identified as follows:

- Four adversary proceedings seeking, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288]. These matters are stayed pending the decision on the Confirmation of the Amended Plan of Adjustment; and
- One adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. These matters remain stayed until such time as the Court orders the stay lifted or a plan of adjustment is confirmed for HTA.

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of April other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

Also, on December 19, 2019, Judge Swain approved a briefing and hearing schedule with respect to motion to dismiss practice related to the GO Lien Challenge. This was stayed pending confirmation of the Amended Plan, pursuant to March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto*. GJB's involvement in the GO Lien Challenge is limited to one adversary listed below.

- One adversary proceeding challenging liens asserted by certain holders of GO bonds Adv. Proc. No. 19-297].

GJB's involvement in the GO Lien Challenge is expected to be minimal.

**1. Staffing Plan**

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period December 1, 2020 through December 31, 2020</b>	<b>Average hourly rate for period December 1, 2020 through December 31, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	2	\$575	\$460
<b>Partner</b>	2	\$500	\$400

<b>(10+ Years)</b>			
<b>Associate</b>	2	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period December 1, 2020 through December 31, 2020</b>
B191 General Litigation	10
<b>TOTAL HOURS</b>	<b>10</b>

**D. ERS Lien Co-Plaintiff Adversary Proceedings**

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the August 25<sup>th</sup>, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking declarations that the pertinent ERS bonds were issued *ultra vires* and, thus, are null and void, *i.e.*, Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361 were unstayed. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

In connection with the *ultra vires* objection to the ERS Bonds, GJB anticipates it will continue to be involved in certain discovery and briefing issues on a limited basis during the month of April.

1. Staffing Plan

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period December 1, 2020 through December 31, 2020</b>	<b>Average hourly rate for period December 1, 2020 through December 31, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	2	\$575	\$460
<b>Partner (10+ Years)</b>	2	\$500	\$400
<b>Associate</b>	2	\$375	\$300

<b>Paraprofessionals</b>	2	\$195	\$156
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2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period December 1, 2020 through December 31, 2020</b>
B191 General Litigation	15
<b>TOTAL HOURS</b>	<b>15</b>

E. Contested Matters.

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); proceedings relating to terminating the PREPA RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in these matters as it relates to conflict issues.

1. Staffing Plan

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period December 1, 2020 through December 31, 2020</b>	<b>Average hourly rate for period December 1, 2020 through December 31, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	3	\$645	\$516
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period December 1, 2020 through December 31, 2020</b>
B190 Other Contested Matters	10
<b>TOTAL HOURS</b>	<b>10</b>

### **GENERAL STAFFING PLAN**

**Period Covered:** December 1, 2020 through December 31, 2020<sup>4</sup>

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period December 1, 2020 through December 31, 2020</b>	<b>Average hourly rate for period December 1, 2020 through December 31, 2020 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	5	\$615	\$492
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

<sup>4</sup> Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)  
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel  
to the Official Committee Of Unsecured Creditors  
Of The Commonwealth Of Puerto Rico, *et al.*

### **BUDGET**

**Period Covered:** January 1, 2021 through January 31, 2021<sup>1</sup>

U.S. Trustee Task Code and Project Category	Estimated Hours for Period January 1, 2021 through January 31, 2021
<p>B110 Case Administration</p> <p><i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i></p> <p style="text-align: right;"><i>Two month trailing average <math>\pm 20.4</math></i></p>	15
<p>B112 General Creditor Inquiries</p> <p style="text-align: right;"><i>Two month trailing average 0</i></p>	0
<p>B113 Pleadings Review</p> <p><i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i></p> <p style="text-align: right;"><i>Two month trailing average <math>\pm 34.1</math></i></p>	25
B120 Asset Analysis and Recovery	0

<sup>1</sup> Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no new plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed budget has been revised to account for the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto, (as amended and modified by subsequent orders) with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee.

B130 Asset Disposition	0
B140 Relief from Stay / Adequate Protection Proceedings	0
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p> <p><i>Two month trailing average <math>\pm 8.1</math></i></p>	10
<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee.</i></p> <p><i>Two month trailing average <math>\pm 3.1</math></i></p>	5
<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p> <p><i>Two month trailing average <math>\pm 6.5</math></i></p>	7
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p> <p><i>Two month trailing average <math>\pm 3.1</math></i></p>	3



<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p> <p>Two month trailing average 0</p>	<p>2</p>
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p> <p>Two month trailing average 0</p>	<p>3</p>
<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers as well as requests for settlement that are impacted by such claims. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p> <p>Two month trailing average 0</p>	<p>0</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p> <p>Two month trailing average 0</p>	<p>0</p>

<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the Title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. Currently, the disputes in which GJB has primary responsibility are limited in scope due to the stay orders in effect.</i></p> <p style="text-align: right;"><i>Two month trailing average <math>\pm 2.4</math></i></p>	10
<p>191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)</p> <p><i>Notes: GJB anticipates significant briefing and motion practice relating to the class action plaintiffs' effort to intervene and the pending declaratory judgment action against PREPA with respect to the right to proceed against the Fuel Oil Defendants. GJB anticipates responses and challenges to these efforts by other interested parties</i></p> <p><i>GJB anticipates continued prosecution of causes of action with the Oversight Board/Special Claims Committee regarding any conflicts regarding prosecution of the ERS lien challenges as modified by the ERS Scheduling Order.</i></p> <p><i>GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to those limited issues excepted from the Stay or pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto</i></p> <p><i>This task code includes all adversary proceedings, which consist of (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues.</i></p>	225

<p><i>Currently, many of these matters are stayed pursuant to Court orders in effect.</i></p> <p><i>Two month trailing average <math>\pm</math> 286.5</i></p>	
<p>B195 Non-Working Travel<sup>2</sup></p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i></p>	0
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p> <p><i>Two month trailing average 0</i></p>	0
<p>B220 Employee Benefits/Pensions</p> <p><i>Two month trailing average 0</i></p>	0
<p>B230 Financing / Cash Collections</p> <p><i>Two month trailing average 0</i></p>	0
<p>B231 Security Document Analysis</p> <p><i>Two month trailing average 0</i></p>	0
<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p> <p><i>Two month trailing average <math>\pm</math> 1.8</i></p>	6

<sup>2</sup> The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

B261 Investigations	
Two month trailing average 0	0
B310 Claims Administration and Objections	
Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.	
Two month trailing average 0	3
B320 Plan and Disclosure Statement	
Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's anticipated filing of an amended Commonwealth plan of adjustment and disclosure statement, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.	
Two month trailing average 0	0
B420 Restructurings	
Notes: This task code includes time spent on general restructuring matters, including an anticipated amendment Commonwealth Plan of Adjustment and Disclosure Statement, and matters related to the pending PREPA RSA) and the related 9019 motion.	
GJB anticipates continued involvement in the these matters to the extent that Paul Hastings is conflicted from the representation	
Two month trailing average 0	0
<b>TOTAL HOURS</b>	<b>314</b>
<b>TOTAL ESTIMATED FEE<sup>3</sup></b>	<b>\$161,731.98</b>
<b>MINUS 20% REDUCTION</b>	<b>\$32,346.40</b>
<b>TOTAL ESTIMATED FEE (NET OF REDUCTION)</b>	<b>\$129,855.58</b>

<sup>3</sup> Assumes Blended Rate of \$515.07

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)  
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

**Period Covered:** January 1, 2021 through January 31, 2021

**A. Adversary Proceedings Against Financial Parties, Fuel Oil Defendants, and Other Proceedings**

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two (2) principal adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS].

Pursuant to the Order entered on December 10, 2019, the litigation in Adv. Proc. No. 19-00388 was stayed through August 17, 2020 at which time a joint status report was issued. The Defendants responded and the issues were briefed for hearing on September 16, 2020, but not heard, and remain under advisement. The remaining issue is the intervention of the Marrero Class Action Plaintiffs, which the parties have agreed to resolve in the Marrero Class Action Plaintiffs’ complaint to declare its right to pursue the claims against the Fuel Oil defendants in Adv. Pro. No. 20-00115. The briefing schedule anticipates a motion to dismiss by January 19, 2021 with further briefing and a hearing on April 28, 2021. Pending that resolution, the Court has extended the stay in Adv. Pro. No. 19-388.

The stay relating to Adv. Proc. No. 19-280 was set to expire in April 2020, but the March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto* stays the proceedings pending a decision on confirmation. GJB is also involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings.

**1. Staffing Plan**

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period January 1, 2021 through January 31, 2021</b>	<b>Average hourly rate for period January 1, 2021 through January 31, 2021 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	2	\$680	\$544
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300

<b>Paraprofessionals</b>	2	\$195	\$156
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2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period January 1, 2021 through January 31, 2021</b>
B191 General Litigation	190
<b>TOTAL HOURS</b>	<b>190</b>

**B. Garden-Variety Avoidance Actions**

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

On June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On August 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*”

1. Staffing Plan

<b>Category of timekeeper (using categories maintained by the</b>	<b>Number of timekeepers expected to work on the matter</b>	<b>Average hourly rate for period January 1, 2021 through January</b>	<b>Average hourly rate for period January 1, 2021 through January</b>
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firm)	during the budget period	31, 2021	31, 2021 (net of 20% reduction)
<b>Partner (20+ Years)</b>	2	\$575	\$460
<b>Partner (10+ Years)</b>	2	\$500	\$400
<b>Associate</b>	2	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period January 1, 2021 through January 31, 2021
B191 General Litigation	10
<b>TOTAL HOURS</b>	<b>10</b>

C. Currently Stayed Co-Plaintiff Adversary Proceedings

The Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee as to certain Adversary Proceedings. GJB represents the Committee as Special Litigation counsel in a subset of these adversary proceedings. Pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto the Court extended the stay. These matters are identified as follows:

- Four adversary proceedings seeking, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288]. These matters are stayed pending the decision on the Confirmation of the Amended Plan of Adjustment; and
- One adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. These matters remain stayed until such time as the Court orders the stay lifted or a plan of adjustment is confirmed for HTA.

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of April other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

Also, on December 19, 2019, Judge Swain approved a briefing and hearing schedule with respect



to motion to dismiss practice related to the GO Lien Challenge. This was stayed pending confirmation of the Amended Plan, pursuant to March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto*. GJB's involvement in the GO Lien Challenge is limited to one adversary listed below.

- One adversary proceeding challenging liens asserted by certain holders of GO bonds Adv. Proc. No. 19-297].

GJB's involvement in the GO Lien Challenge is expected to be minimal.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period January 1, 2021 through January 31, 2021	Average hourly rate for period January 1, 2021 through January 31, 2021 (net of 20% reduction)
<b>Partner (20+ Years)</b>	2	\$575	\$460
<b>Partner (10+ Years)</b>	2	\$500	\$400
<b>Associate</b>	2	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period January 1, 2021 through January 31, 2021
B191 General Litigation	10
<b>TOTAL HOURS</b>	<b>10</b>

**D. ERS Lien Co-Plaintiff Adversary Proceedings**

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the August 25<sup>th</sup>, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking declarations that the pertinent ERS bonds were issued *ultra vires* and, thus,



are null and void, *i.e.*, Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361 were unstayed. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

In connection with the *ultra vires* objection to the ERS Bonds, GJB anticipates it will continue to be involved in certain discovery and briefing issues on a limited basis during the month of April.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period January 1, 2021 through January 31, 2021	Average hourly rate for period January 1, 2021 through January 31, 2021 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period January 1, 2021 through January 31, 2021
B191 General Litigation	15
<b>TOTAL HOURS</b>	<b>15</b>

E. Contested Matters.

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); proceedings relating to terminating the PREPA RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in these matters as it relates to conflict issues.

1. Staffing Plan

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period January 1, 2021 through January 31, 2021</b>	<b>Average hourly rate for period January 1, 2021 through January 31, 2021 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	3	\$645	\$516
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

2. Sub-Budget

<b>U.S. Trustee Task Code and Project Category</b>	<b>Estimated Hours for Period January 1, 2021 through January 31, 2021</b>
B190 Other Contested Matters	10
<b>TOTAL HOURS</b>	<b>10</b>

**GENERAL STAFFING PLAN**

**Period Covered:** January 1, 2021 through January 31, 2021<sup>4</sup>

<sup>4</sup> Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period January 1, 2021 through January 31, 2021</b>	<b>Average hourly rate for period January 1, 2021 through January 31, 2021 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	5	\$615	\$492
<b>Partner (10+ Years)</b>	2	\$525	\$420
<b>Associate</b>	4	\$375	\$300
<b>Paraprofessionals</b>	2	\$195	\$156

**EXHIBIT D-2**

**STAFFING PLAN**

**Period Covered:** September 1, 2020-January 31, 2021

<b>Category of timekeeper (using categories maintained by the firm)</b>	<b>Number of timekeepers expected to work on the matter during the budget period</b>	<b>Average hourly rate for period 09/01/20 through 01/31/21</b>	<b>Average hourly rate for period 09/01/20 through 01/31/21 (net of 20% reduction)</b>
<b>Partner (20+ Years)</b>	3	\$635.68	\$508.54
<b>Partner (10+ Years)</b>	2	\$500.85	\$400.65
<b>Associate</b>	4	\$344.28	\$275.42
<b>Paraprofessionals</b>	4	\$191.81	\$153.45

**EXHIBIT E**

***SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY***

**EXHIBIT E-1**

**SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY**

<b>U.S. TRUSTEE TASK CODE AND PROJECT CATEGORY</b>	<b>September 2020</b>	<b>October 2020</b>	<b>November 2020</b>	<b>December 2020</b>	<b>January 2021</b>	<b>TOTAL</b>
<b>B110</b> Case Administration	24.40	22.60	18.60	14.40	14.50	94.50
<b>B112</b> General Creditor Inquiries						
<b>B113</b> Pleadings Review	32.30	29.40	30.00	28.40	27.80	147.90
<b>B120</b> Asset Analysis and Recovery						
<b>B130</b> Asset Disposition						
<b>B140</b> Relief from Stay / Adequate Protection Proceedings						
<b>B150</b> Meetings of Creditors' Committee and Communications with Creditors	12.60	9.80	2.70	2.20	1.60	29.20
<b>B155</b> Court Hearings (including Preparation for Court Hearings)	1.90	4.30				6.20
<b>B160</b> Employment / Fee Applications	8.20	4.70	24.40	3.30	5.10	45.70
<b>B161</b> Budgeting (Case)	2.30	1.90	1.70	3.90	1.80	11.60
<b>B165</b> Employment / Fee Application (Other Professionals)						
<b>B170</b> Fee and Employment Objections						
<b>B180</b> Avoidance Action Analysis						
<b>B181</b> Preference Analysis and Recovery Action						
<b>B185</b> Assumption / Rejection of Leases and Contracts						
<b>B190</b> Other Contested Matters (including GDB restructuring)	2.40				0.30	2.70
<b>B191</b> General Litigation	295.60	215.10	92.10	96.30	37.10	736.20
<b>B195</b> Non-Working Travel						

<b>U.S. TRUSTEE TASK CODE AND PROJECT CATEGORY</b>	<b>September 2020</b>	<b>October 2020</b>	<b>November 2020</b>	<b>December 2020</b>	<b>January 2021</b>	<b>TOTAL</b>
<b>B210</b> Debtors' Financial Information						
<b>B220</b> Employee Benefits / Pensions						
<b>B230</b> Financing / Cash Collections						
<b>B231</b> Security Document Analysis						
<b>B260</b> Meetings/Communications with Debtors/ Oversight Board	2.30		0.20	0.30		2.80
<b>B261</b> Investigations						
<b>B310</b> Claims Administration and Objections						
<b>B312</b> Objections to Claims						
<b>B320</b> Plan and Disclosure Statement						
<b>B321</b> Business Plan						
<b>B410</b> General Bankruptcy Advice and Opinions						
<b>B420</b> Restructurings						
<b>TOTAL HOURS</b>	382.80	287.80	169.70	148.80	88.20	\$1,077.30
<b>TOTAL FEES</b>	\$188,671.00	\$140,400.50	\$71,106.50	\$64,868.73	\$34,225.50	\$499,302.23
<b>MINUS 20% REDUCTION</b>	\$37,734.20	\$28,080.10	\$14,221.30	\$12,973.85	\$6,851.10	\$99,860.44
<b>TOTAL FEES (NET OF REDUCTION)</b>	\$150,936.80	\$112,320.40	\$56,885.20	\$51,894.88	\$27,404.40	\$399,441.79

**FURTHER BREAKDOWN OF COMPENSATION REQUESTED  
BY PROJECT CATEGORY AND BY MATTER**

*Official Committee of Unsecured Creditors of Commonwealth of PR (Matter ID 001)*

<b>U.S. Trustee Task Code and Project Category</b>	<b>Hours Billed</b>	<b>Fees Sought</b>
B110 Case Administration	55.90	\$11,118.50
B113 Pleadings Review	147.90	\$46,588.50
B150 Meeting of Creditors	19.70	\$11,364.00
B155 Court Hearings	6.20	\$3,345.00
B160 Employment / Fee Applications (GJB)	45.70	\$13,026.50
B161 Budgeting (Case)	10.50	\$6,037.50
B165 Employment / Fee Applications (Other Professionals)		
B170 Fee/Employment Objections		
B190 Other Contested Matters		
B191 General Litigation	349.00	\$197,748.23
B210 Debtors' Fiscal Plan		
B260 Meetings and Communications with Board		
B320 Plan and Disclosure Statement		
B420 Restructurings		
<b>TOTAL</b>	<b>634.90</b>	<b>\$289,228.23</b>

*PREPA (Matter ID 002)*

<b>U.S. Trustee Task Code and Project Category</b>	<b>Hours Billed</b>	<b>Fees Sought</b>
B110 Case Administration	16.00	\$3,408.00
B113 Pleadings Review		
B150 Meeting of Creditors	9.50	\$5,282.50
B155 Court Hearings		
B161 Budgeting	1.10	\$632.50
B190 Other Contested Matters		
B191 General Litigation	339.20	\$166,564.00
B210 Debtors' Fiscal Plan		
B260 Meetings and Communications with Board	3.30	\$1,860.00
B320 Plan and Disclosure Statement		
<b>TOTAL</b>	<b>369.10</b>	<b>\$177,750.00</b>



***ERS (Matter ID 003)***

<b>U.S. Trustee Task Code and Project Category</b>	<b>Hours Billed</b>	<b>Fees Sought</b>
B110 Case Administration	22.60	\$4,407.00
B190 Other Contested Matters	2.70	\$1,552.50
B191 General Litigation	47.10	\$25,964.00
B260 Meetings of and Communications with Board		
B320 Plan and Disclosure Statement		
<b>TOTAL</b>	<b>72.40</b>	<b>\$31,923.50</b>

***HTA (Matter ID 004)***

<b>U.S. Trustee Task Code and Project Category</b>	<b>Hours Billed</b>	<b>Fees Sought</b>
B110 Case Administration	0.90	\$403.50
B191 General Litigation		
<b>TOTAL</b>	<b>0.90</b>	<b>\$403.50</b>

***Kobre & Kim Report (Matter ID 005)***

N/A

**EXHIBIT E-2**

**SUMMARY OF EXPENSE REIMBURSEMENTS REQUESTED BY CATEGORY**

<b>Category</b>	<b>Amount</b>
Travel Expenses – Airfare	\$0.00
Travel Expenses – Lodging	\$0.00
Travel Expenses - Taxi / Ground Transportation	\$0.00
Travel Expenses – Parking	\$0.00
Meals (while working on Committee matters)	\$0.00
Court call	\$0.00
Long Distance Phone Calls	\$0.00
Process Service Fee	\$0.00
Messenger	\$0.00
Computer Search	\$2,521.00
Articles and Publications	\$0.00
Court Reporting Services	\$0.00
In-house Black and White Reproduction Charges	\$0.00
Outside Photocopies	\$0.00
Outside Professional Services	\$0.00
Postage/Express Mail	\$210.00
Data Management/Web Hosting	\$21,524.11
Miscellaneous- Website Domain and Maintenance	\$7,098.84
<b>TOTAL</b>	<b>\$31,381.55</b>

**EXHIBIT F**

**BREAKDOWN OF COMPENSATION AND EXPENSE REIMBURSEMENT AND BY  
WHETHER SERVICES WERE RENDERED IN PUERTO RICO OR OUTSIDE  
PUERTO RICO**

**September 2020 Fee Statement**

	<b>Fees</b>	<b>20% Discount</b>	<b>Fees Requested to Be Paid (90%)</b>	<b>Expenses Requested to Be Paid (100%)</b>	<b>Total Fees &amp; Expenses Requested to Be Paid</b>
Total for Commonwealth (all outside of Puerto Rico)	\$83,623.00	\$66,898.40 (\$16,724.60)	\$60,208.56	\$8,294.92	\$68,503.48
Total for PREPA (all outside of Puerto Rico)	\$91,065.00	\$72,852.00 (\$18,213.00)	\$65,566.80	\$59.70	\$65,626.50
Total for ERS (all outside of Puerto Rico)	\$13,579.50	\$10,863.60 (\$2,715.90)	\$79,777.24	\$0.00	\$9,777.24
Total for HTA (all outside of Puerto Rico)	\$403.50	\$322.80 (\$280.70)	\$290.52	\$0.00	\$290.52
<b>Grand Total</b>	<b>\$188,671.00</b>	<b>\$150,936.80</b>	<b>\$135,843.12</b>	<b>\$8,354.62</b>	<b>\$144,197.74</b>

**October 2020 Fee Statement**

	<b>Fees</b>	<b>20% Discount</b>	<b>Fees Requested to Be Paid (90%)</b>	<b>Expenses Requested to Be Paid (100%)</b>	<b>Total Fees &amp; Expenses Requested to Be Paid</b>
Total for Commonwealth (all outside of Puerto Rico)	\$104,209.00	\$83,367.20 (\$20,841.80)	\$75,030.48	\$7,331.55	\$82,362.03
Total for PREPA (all outside of Puerto Rico)	\$29,852.50	\$23,882.00 (\$5,970.50)	\$21,493.80	\$0.00	\$21,493.80
Total for ERS (all outside of Puerto Rico)	\$6,339.00	\$5,071.20 (\$1,267.80)	\$4,564.08	\$0.00	\$4,564.08
Total for HTA (all outside of Puerto Rico)	N/A	N/A	N/A	N/A	N/A
<b>Grand Total</b>	<b>\$140,400.50</b>	<b>\$112,320.40</b>	<b>\$101,088.36</b>	<b>\$7,331.55</b>	<b>\$108,419.91</b>

**November 2020 Fee Statement**

	<b>Fees</b>	<b>20% Discount</b>	<b>Fees Requested to Be Paid (90%)</b>	<b>Expenses Requested to Be Paid (100%)</b>	<b>Total Fees &amp; Expenses Requested to Be Paid</b>
Total for Commonwealth (all outside of Puerto Rico)	\$37,604.00	\$30,083.20 (\$7,520.80)	\$27,074.88	\$7,308.84	\$34,383.72
Total for PREPA (all outside of Puerto Rico)	\$27,809.50	\$22,247.60 (\$5,561.90)	\$20,022.84	\$9.00	\$20,031.84
Total for ERS (all outside of Puerto Rico)	\$5,693.00	\$4,554.40 (\$1,138.60)	\$4,098.96	\$0.00	\$4,098.96
Total for HTA (all outside of Puerto Rico)	N/A	N/A	N/A	N/A	N/A
<b>Grand Total</b>	<b>\$71,106.50</b>	<b>\$56,885.20</b>	<b>\$51,196.68</b>	<b>\$7,317.84</b>	<b>\$58,514.52</b>

**December 2020 Fee Statement**

	<b>Fees</b>	<b>20% Discount</b>	<b>Fees Requested to Be Paid (90%)</b>	<b>Expenses Requested to Be Paid (100%)</b>	<b>Total Fees &amp; Expenses Requested to Be Paid</b>
Total for Commonwealth (all outside of Puerto Rico)	\$42,505.73	\$34,004.58 (\$8,501.15)	\$30,604.13	\$8,089.94	\$37,703.07
Total for PREPA (all outside of Puerto Rico)	\$18,347.50	\$14,678.00 (\$3,669.50)	\$13,210.20	\$278.60	\$13,488.80
Total for ERS (all outside of Puerto Rico)	\$4,015.50	\$3,212.40 (\$803.10)	\$2,891.16	\$0.00	\$2,891.16
Total for HTA (all outside of Puerto Rico)	N/A	N/A	N/A	N/A	N/A
<b>Grand Total</b>	<b>\$68,868.73</b>	<b>\$51,894.98</b>	<b>\$46,705.49</b>	<b>\$8,377.54</b>	<b>\$55,083.03</b>

**January 2021 Fee Statement**

	<b>Fees</b>	<b>20% Discount</b>	<b>Fees Requested to Be Paid (90%)</b>	<b>Expenses Requested to Be Paid (100%)</b>	<b>Total Fees &amp; Expenses Requested to Be Paid</b>
Total for Commonwealth (all outside of Puerto Rico)	\$21,286.50	\$17,029.20 (\$4,257.30)	\$15,326.28	\$0.00	\$15,326.28
Total for PREPA (all outside of Puerto Rico)	\$10,672.50	\$8,538.00 (\$2,134.50)	\$7,684.20	\$0.00	\$7,684.20
Total for ERS (all outside of Puerto Rico)	\$2,296.50	\$1,837.20 (\$459.30)	\$7,684.20	\$0.00	\$7,684.20
Total for HTA (all outside of Puerto Rico)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>Grand Total</b>	<b>\$34,255.50</b>	<b>\$27,404.40</b>	<b>\$24,663.96</b>	<b>\$0.00</b>	<b>\$24,663.96</b>

**SCHEDULE 1**

**LIST OF PROFESSIONALS BY MATTER**

***Official Comm. of Unsecured Creditors of Commonwealth of PR (Matter ID 001)***

<b>Name</b>	<b>Title or Position</b>	<b>Department, Group, or Section</b>
Genovese, John H.	Partner	Bankruptcy
Arrastia, John	Partner	Litigation
Suarez, Jesus M.	Partner	Bankruptcy
Friedman, Michael A.	Partner	Bankruptcy
Gayo-Guitian, Mariaelena	Partner	Bankruptcy
Castaldi, Angelo M.	Associate	Litigation
Rosner, Jeremy S.	Associate	Litigation
Delgado, Joyce A.	Associate	Litigation
Hopkins, Colleen	Paralegal	Bankruptcy
Sardina, Jessey	Paralegal	Bankruptcy
Zamora, Johana	Paralegal	Bankruptcy
Esser-Scavone, Carolyn	Paralegal	Bankruptcy

***PREPA (Matter ID 002)***

<b>Name</b>	<b>Title or Position</b>	<b>Department, Group, or Section</b>
Genovese, John H.	Partner	Bankruptcy
Arrastia, John	Partner	Litigation
Suarez, Jesus M.	Partner	Bankruptcy
Friedman, Michael	Partner	Bankruptcy
Castaldi, Angelo M.	Associate	Litigation
Rosner, Jeremy S.	Associate	Litigation
Kalbac, Patrick T.	Associate	Litigation
Zamora, Johana	Paralegal	Bankruptcy

***ERS (Matter ID 003)***

<b>Name</b>	<b>Title or Position</b>	<b>Department, Group, or Section</b>
Arrastia, John	Partner	Litigation
Genovese, John	Partner	Bankruptcy
Suarez, Jesus M.	Partner	Bankruptcy
Castaldi, Angelo M.	Associate	Bankruptcy
Zamora, Johana	Paralegal	Bankruptcy

***HTA (Matter ID 004)***

<b>Name</b>	<b>Title or Position</b>	<b>Department, Group, or Section</b>
Genovese, John	Partner	Bankruptcy
Zamora, Johana	Paralegal	Bankruptcy

***Kobra & Kim Report (Matter ID 005)***

<b>Name</b>	<b>Title or Position</b>	<b>Department, Group, or Section</b>
N/A	N/A	N/A

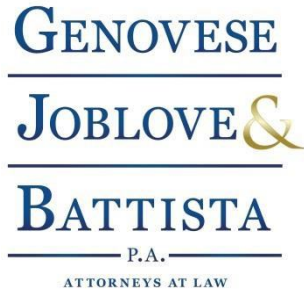
**SCHEDULE 2**

**MONTHLY STATEMENTS COVERED IN  
APPLICATION**

**(attached hereto)**

<b>DATE</b>	<b>PERIOD COVERED</b>	<b>TOTAL FEES</b>	<b>20% DISCOUNT</b>	<b>FEES REQUESTED (90%)</b>	<b>HOLDBACK (10%)</b>	<b>EXPENSES REQUESTED</b>
December 17, 2020	September 1, 2020- September 30, 2020	\$188,671.00	\$150,936.80	\$135,843.12	\$15,093.68	\$8,354.64
February 2, 2021	October 1, 2020- October 31, 2020	\$140,400.50	\$112,320.40	\$101,088.36	\$11,232.04	\$7,331.55
January 29, 2021	November 1, 2020- November 30, 2020	\$71,106.50	\$56,885.20	\$51,196.68	\$5,688.52	\$7,317.84
February 12, 2021	December 1, 2020- December 31, 2020	\$64,868.73	\$51,894.98	\$46,705.49	\$5,189.49	\$8,377.54
March 15, 2021	January 1, 2021- January 31, 2021	\$34,255.50	\$27,404.40	\$24,663.96	\$2,740.44	\$0.00





December 17, 2020

Via Electronic Mail

The Commonwealth of Puerto Rico  
Puerto Rico Fiscal Agency and Financial Advisory Authority  
c/o O'Melveny & Myers, LLP  
Time Square Tower  
7 Times Square  
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)  
(Jointly Administered) –  
Genovese, Joblove & Battista, P.A. September 2020 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s September 2020 Fee Statement (the “September Fee Statement”) for certain services rendered and expenses incurred during the period ending September 30, 2020.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with

the Committee.<sup>1</sup> The amount shown on the attached invoices is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit “A”*** the certification authorizing the submission of the September Fee Statement. Also attached hereto as ***Exhibit “B”*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the September Fee Statement is provided below for your ease of reference.

**1. Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$16,724.60)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	99885	\$83,623.00	\$66,898.40	\$60,208.56	\$8,294.92	\$68,503.48

**2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$18,213.00)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	99886	\$91,065.00	\$72,852.00	\$65,566.80	\$59.70	\$65,626.50

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<sup>1</sup> For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

**3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$2,715.90)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	99887	\$13,579.50	\$10,863.60	\$9,777.24	\$0.00	\$9,777.24

**4. HTA Litigation- 004 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$80.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	99888	\$403.50	\$322.80	\$290.52	\$0.00	\$290.52

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$188,671.00 plus costs of \$8,354.62 for a total of \$197,025.62. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in September is equal to \$37,734.20. The costs are \$8,354.62. Accordingly, GJB seeks payment of \$135,843.12 in fees (90% of the total discounted fees) and \$8,354.62 in costs (100% of the costs) as detailed in the September Fee Statement for a total of \$144,197.74.

Any objections you may have to the September Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10<sup>th</sup> day (or the next business day if such day is not a business day) following service of the September Fee Statement, which is **December 28, 2020** (“Objection Deadline”). If no party serves an objection to the September Statement on GJB and the other Notice Parties attached hereto as ***Exhibit “C”*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$144,197.74 to the following account:

**Wiring and ACH Instructions:**

Beneficiary Bank : First Citizens Bank

ABA Number : 053100300

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050

Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the September Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,

*/s/ Mariaelena Gayo- Guitian*

Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

**PRINCIPAL CERTIFICATION**

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s September fee statement for certain services rendered and expenses incurred during the period ending September 30, 2020.

/s/ Alvin Velazquez

Name: Alvin Velazquez  
Company: Service Employees International Union  
Dated: December 17, 2020

Exhibit B

Tax Declaration



### **DECLARATION**

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., (“GJB” or “Service Provider”) with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 (“Miami” or “Main Office”); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 (“Ft. Lauderdale”) and 100 N. Tampa Street, Suite 2600, Tampa, Florida (“Tampa”). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.
2. The facts set forth in this declaration are based upon my personal knowledge and the firm’s financial records that were reviewed by me or other GJB employees acting under my supervision and direction
3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of September 2020;
4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.
5. GJB’s taxable year ends on December 31 (the “Tax Year”).
6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.
7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on September 1, 2020 through September 30, 2020, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the “Code”):



**1. Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$16,724.60)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	99885	\$83,623.00	\$66,898.40	\$60,208.56	\$8,294.92	\$68,503.48

**2. Puerto Rico Electric Power Authority ("PREPA") 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$18,213.00)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	99886	\$91,065.00	\$72,852.00	\$65,566.80	\$59.70	\$65,626.50

**3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$2,715.90)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	99887	\$13,579.50	\$10,863.60	\$9,777.24	\$0.00	\$9,777.24

**4. HTA Litigation- 004 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$80.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	99888	\$403.50	\$322.80	\$290.52	\$0.00	\$290.52

8. The invoices submitted in connection with the September Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$188,671.00 plus costs of \$8,354.62 for a total of \$197,025.62.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$37,734.20 (20% discount). The costs are \$8,354.62. Accordingly, GJB seeks payment of \$135,843.12 in fees (90% of the total discounted fees) and \$8,354.62 in costs (100% of the costs) as detailed in the September Fee Statement for a total of \$144,197.74.

**IN WITNESS WHEREOF**, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 17<sup>th</sup> day of December 2020, in Miami, Florida.

  
\_\_\_\_\_  
KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP  
Eleven Times Square  
New York, NY  
10036  
Attn: Martin J. Bienenstock, Esq.  
Ehud Barak Esq. and

Proskauer Rose LLP,  
70 West Madison  
Street, Chicago, IL  
60602  
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC  
250 Mulioz Rivera Ave., Suite 800  
San Juan, PR 00918  
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz  
LLC MCS Plaza, Suite 500  
255 Ponce de León Ave  
San Juan, PR 00917  
Attn: Luis C. Marini-Biaggi, Esq.  
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa  
500 Tanca Street, Suite 301  
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings  
200 Park Avenue  
New York, NY 10166  
Attn: Luc A. Despina, Esq.



Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC  
El Caribe office Building  
53 Palmeras Street, Ste. 1601  
San Juan, Puerto Rico 00901  
Attn: Juan J . Casillas Ayala, Esq.  
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.  
One East Main Street, Suite 500  
Madison, Wisconsin 53703-3300  
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG  
252 Ponce de Le6n  
Avenue Citibank Tower,  
12th Floor San Juan, PR  
00918  
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico  
Edificio Ochoa  
500 Tanca Street, Suite 301  
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP  
919 Third Ave.  
New York, NY 10022  
Attn: Robert Gordon, Esq.  
Richard Levin, Esq.

and

Jenner & Block LLP  
353 N. Clark Street  
Chicago, IL 60654  
Attn: Catherine Steege, Esq.  
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.  
Edificio Union Plaza, PH-A,  
416 Ave. Ponce de Leon  
Hate Rey, PR 00918  
Attn: A.J. Bennazar-Zequiera, Esq.

Puerto Rico Department of Treasury

Puerto Rico Department of  
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting  
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting  
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax  
Policy  
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy  
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury



February 2, 2021

Via Electronic Mail

The Commonwealth of Puerto Rico  
Puerto Rico Fiscal Agency and Financial Advisory Authority  
c/o O'Melveny & Myers, LLP  
Time Square Tower  
7 Times Square  
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)  
(Jointly Administered) –  
Genovese, Joblove & Battista, P.A. October 2020 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the "Retention Order"), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. ("GJB") as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the "Interim Compensation Order") please find enclosed copies of GJB's October 2020 Fee Statement (the "October Fee Statement") for certain services rendered and expenses incurred during the period ending October 31, 2020.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with the Committee.<sup>1</sup> The amount shown on the attached invoices is reasonable. The services were

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<sup>1</sup> For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB's fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB's fees and expenses.

rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit “A”*** the certification authorizing the submission of the October Fee Statement. Also attached hereto as ***Exhibit “B”*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the October Fee Statement is provided below for your ease of reference.

**1. Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$20,841.80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	100020	\$104,209.00	\$83,367.20	\$75,030.48	\$7,331.55	\$82,362.03

**2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$5,970.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	100021	\$29,852.50	\$23,882.00	\$21,493.80	\$0.00	\$21,493.80

**3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,267.80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	100022	\$6,339.00	\$5,071.20	\$4,564.08	\$0.00	\$4,564.08



Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$140,400.50 plus costs of \$7,331.55 for a total of \$147,732.05. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in October is equal to \$28,080.10. The costs are \$7,331.55. Accordingly, GJB seeks payment of \$101,088.36 in fees (90% of the total discounted fees) and \$7,331.55 in costs (100% of the costs) as detailed in the October Fee Statement for a total of \$108,419.91.

Any objections you may have to the October Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10<sup>th</sup> day (or the next business day if such day is not a business day) following service of the October Fee Statement, which is **February 12, 2021** (“Objection Deadline”). If no party serves an objection to the October Statement on GJB and the other Notice Parties attached hereto as ***Exhibit “C”*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$108,419.91 to the following account:

**Wiring and ACH Instructions:**

Beneficiary Bank : First Citizens Bank

ABA Number : 053100300

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050

Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the October Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,

*/s/ Mariaelena Gayo- Guitian*

Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

**PRINCIPAL CERTIFICATION**

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s October fee statement for certain services rendered and expenses incurred during the period ending October 31, 2020.

/s/ Alvin Velazquez

Name: Alvin Velazquez  
Company: Service Employees International  
Union  
Dated: January 28, 2021

Exhibit B

Tax Declaration

### DECLARATION

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., ("GJB" or "Service Provider") with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 ("Miami" or "Main Office"); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 ("Ft. Lauderdale") and 100 N. Tampa Street, Suite 2600, Tampa, Florida ("Tampa"). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. The facts set forth in this declaration are based upon my personal knowledge and the firm's financial records that were reviewed by me or other GJB employees acting under my supervision and direction

3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of October 2020;

4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.

5. GJB's taxable year ends on December 31 (the "Tax Year").

6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.

7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on October 1, 2020 through October 31, 2020, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the "Code");



1. **Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$20,841.80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	100020	\$104,209.00	\$83,367.20	\$75,030.48	\$7,331.55	\$82,362.03

2. **Puerto Rico Electric Power Authority ("PREPA") 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$5,970.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	100021	\$29,852.50	\$23,882.00	\$21,493.80	\$0.00	\$21,493.80

3. **Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,267.80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	100022	\$6,339.00	\$5,071.20	\$4,564.08	\$0.00	\$4,564.08

8. The invoices submitted in connection with the October Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$140,400.50 plus costs of \$7,331.55 for a total of \$147,732.05.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$28,080.10 (20% discount). The costs are \$7,331.55. Accordingly, GJB seeks payment of \$101,088.36 in fees (90% of the total discounted fees) and \$7,331.55 in costs (100% of the costs) as detailed in the

October Fee Statement for a total of \$108,419.91.

IN WITNESS WHEREOF, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 28<sup>th</sup> day of January, 2021, in Miami, Florida.

A handwritten signature in blue ink, appearing to read 'Ken A', is written over a horizontal line.

KEN FORREST

Exhibit C

Notice Parties



Counsel for the Oversight Board

Proskauer Rose LLP  
Eleven Times Square  
New York, NY  
10036  
Attn: Martin J. Bienenstock, Esq.  
Ehud Barak Esq. and

Proskauer Rose LLP,  
70 West Madison  
Street, Chicago, IL  
60602  
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC  
250 Mulioz Rivera Ave., Suite 800  
San Juan, PR 00918  
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz  
LLC MCS Plaza, Suite 500  
255 Ponce de León Ave  
San Juan, PR 00917  
Attn: Luis C. Marini-Biaggi, Esq.  
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa  
500 Tanca Street, Suite 301  
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings  
200 Park Avenue  
New York, NY 10166  
Attn: Luc A. Despina, Esq.

Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC  
El Caribe office Building  
53 Palmeras Street, Ste. 1601  
San Juan, Puerto Rico 00901  
Attn: Juan J . Casillas Ayala, Esq.  
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.  
One East Main Street, Suite 500  
Madison, Wisconsin 53703-3300  
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG  
252 Ponce de Le6n  
Avenue Citibank Tower,  
12th Floor San Juan, PR  
00918  
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico  
Edificio Ochoa  
500 Tanca Street, Suite 301  
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP  
919 Third Ave.  
New York, NY 10022  
Attn: Robert Gordon, Esq.  
Richard Levin, Esq.

and

Jenner & Block LLP  
353 N. Clark Street  
Chicago, IL 60654  
Attn: Catherine Steege, Esq.  
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.  
Edificio Union Plaza, PH-A,  
416 Ave. Ponce de Leon  
Hate Rey, PR 00918  
Attn: A.J. Bennazar-Zequiera, Esq.

Puerto Rico Department of Treasury

Puerto Rico Department of  
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting  
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting  
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax  
Policy  
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy  
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury



January 29, 2021

Via Electronic Mail

The Commonwealth of Puerto Rico  
Puerto Rico Fiscal Agency and Financial Advisory Authority  
c/o O'Melveny & Myers, LLP  
Time Square Tower  
7 Times Square  
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)  
(Jointly Administered) –  
Genovese, Joblove & Battista, P.A. November 2020 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s November 2020 Fee Statement (the “November Fee Statement”) for certain services rendered and expenses incurred during the period ending November 30, 2020.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with the Committee.<sup>1</sup> The amount shown on the attached invoices is reasonable. The services were

---

<sup>1</sup> For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit “A”*** the certification authorizing the submission of the November Fee Statement. Also attached hereto as ***Exhibit “B”*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the November Fee Statement is provided below for your ease of reference.

**1. Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$7,520.80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	100101	\$37,604.00	\$30,083.20	\$27,074.88	\$7,308.84	\$34,383.72

**2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$5,561.90)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	100102	\$27,809.50	\$22,247.60	\$20,022.84	\$9.00	\$20,031.84

**3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,138.60)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	100103	\$5,693.00	\$4,554.40	\$4,098.96	\$0.00	\$4,098.96

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$71,106.50 plus costs of \$7,317.84 for a total of \$78,424.34. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in November is equal to \$14,221.30. The costs are \$7,317.84. Accordingly, GJB seeks payment of \$51,196.68 in fees (90% of the total discounted fees) and \$7,317.84 in costs (100% of the costs) as detailed in the November Fee Statement for a total of \$58,514.52.

Any objections you may have to the November Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10<sup>th</sup> day (or the next business day if such day is not a business day) following service of the November Fee Statement, which is **February 8, 2021** ("Objection Deadline"). If no party serves an objection to the November Statement on GJB and the other Notice Parties attached hereto as ***Exhibit "C"*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$58,514.52 to the following account:

**Wiring and ACH Instructions:**

Beneficiary Bank : First Citizens Bank

ABA Number : 053100300

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050

Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the November Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,

*/s/ Mariaelena Gayo- Guitian*

Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

**PRINCIPAL CERTIFICATION**

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s November fee statement for certain services rendered and expenses incurred during the period ending November 30, 2020.

/s/ Alvin Velazquez

Name: Alvin Velazquez  
Company: Service Employees International Union  
Dated: January 28, 2021



Exhibit B

Tax Declaration

### **DECLARATION**

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., ("GJB" or "Service Provider") with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 ("Miami" or "Main Office"); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 ("Ft. Lauderdale") and 100 N. Tampa Street, Suite 2600, Tampa, Florida ("Tampa"). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. The facts set forth in this declaration are based upon my personal knowledge and the firm's financial records that were reviewed by me or other GJB employees acting under my supervision and direction

3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of November 2020;

4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.

5. GJB's taxable year ends on December 31 (the "Tax Year").

6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.

7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on November 1, 2020 through November 30, 2020, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the "Code"):

1. **Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$7,520.80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	100101	\$37,604.00	\$30,083.20	\$27,074.88	\$7,308.84	\$34,383.72

2. **Puerto Rico Electric Power Authority ("PREPA") 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$5,561.90)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	100102	\$27,809.50	\$22,247.60	\$20,022.84	\$9.00	\$20,031.84

3. **Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,138.60)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	100103	\$5,693.00	\$4,554.40	\$4,098.96	\$0.00	\$4,098.96

8. The invoices submitted in connection with the November Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$71,106.50 plus costs of \$7,317.84 for a total of \$78,424.34.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$14,221.30 (20% discount). The costs are \$7,317.84. Accordingly, GJB seeks payment of \$51,196.68 in fees (90% of the total discounted fees) and \$7,317.84 in costs (100% of the costs) as detailed in the



November Fee Statement for a total of \$58,514.52.

**IN WITNESS WHEREOF**, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 28<sup>th</sup> day of January, 2021, in Miami, Florida.

  
\_\_\_\_\_  
KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP  
Eleven Times Square  
New York, NY  
10036  
Attn: Martin J. Bienenstock, Esq.  
Ehud Barak Esq. and

Proskauer Rose LLP,  
70 West Madison  
Street, Chicago, IL  
60602  
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC  
250 Mulioz Rivera Ave., Suite 800  
San Juan, PR 00918  
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz  
LLC MCS Plaza, Suite 500  
255 Ponce de León Ave  
San Juan, PR 00917  
Attn: Luis C. Marini-Biaggi, Esq.  
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa  
500 Tanca Street, Suite 301  
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings  
200 Park Avenue  
New York, NY 10166  
Attn: Luc A. Despina, Esq.

Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC  
El Caribe office Building  
53 Palmeras Street, Ste. 1601  
San Juan, Puerto Rico 00901  
Attn: Juan J . Casillas Ayala, Esq.  
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.  
One East Main Street, Suite 500  
Madison, Wisconsin 53703-3300  
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG  
252 Ponce de Le6n  
Avenue Citibank Tower,  
12th Floor San Juan, PR  
00918  
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico  
Edificio Ochoa  
500 Tanca Street, Suite 301  
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP  
919 Third Ave.  
New York, NY 10022  
Attn: Robert Gordon, Esq.  
Richard Levin, Esq.

and

Jenner & Block LLP  
353 N. Clark Street  
Chicago, IL 60654  
Attn: Catherine Steege, Esq.  
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.  
Edificio Union Plaza, PH-A,  
416 Ave. Ponce de Leon  
Hate Rey, PR 00918  
Attn: A.J. Bennazar-Zequiera, Esq.

Puerto Rico Department of Treasury

Puerto Rico Department of  
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting  
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting  
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax  
Policy  
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy  
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury





February 12, 2021

Via Electronic Mail

The Commonwealth of Puerto Rico  
Puerto Rico Fiscal Agency and Financial Advisory Authority  
c/o O'Melveny & Myers, LLP  
Time Square Tower  
7 Times Square  
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)  
(Jointly Administered) –  
Genovese, Joblove & Battista, P.A. December 2020 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the "Retention Order"), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. ("GJB") as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the "Interim Compensation Order") please find enclosed copies of GJB's December 2020 Fee Statement (the "December Fee Statement") for certain services rendered and expenses incurred during the period ending December 31, 2020.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with the Committee.<sup>1</sup> The amount shown on the attached invoices is reasonable. The services were

---

<sup>1</sup> For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB's fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB's fees and expenses.

rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit “A”*** the certification authorizing the submission of the December Fee Statement. Also attached hereto as ***Exhibit “B”*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the December Fee Statement is provided below for your ease of reference.

**1. Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$8,501.15)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	100333	\$42,505.73	\$34,004.58	\$30,604.13	\$8,098.94	\$38,703.07

**2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$3,669.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	100334	\$18,347.50	\$14,678.00	\$13,210.20	\$278.60	\$13,488.80

**3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$803.10)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	100335	\$4,015.50	\$3,212.40	\$2,891.16	\$0.00	\$2,891.16

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$64,868.73 plus costs of \$8,377.54 for a total of \$73,246.27. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in December is equal to \$12,973.75. The costs are \$8,377.54. Accordingly, GJB seeks payment of \$46,705.49 in fees (90% of the total discounted fees) and \$8,377.54 in costs (100% of the costs) as detailed in the December Fee Statement for a total of \$55,083.03.

Any objections you may have to the November Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10<sup>th</sup> day (or the next business day if such day is not a business day) following service of the December Fee Statement, which is **February 22, 2021** (“Objection Deadline”). If no party serves an objection to the November Statement on GJB and the other Notice Parties attached hereto as ***Exhibit “C”*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$55,083.03 to the following account:

**Wiring and ACH Instructions:**

Beneficiary Bank : First Citizens Bank

ABA Number : 053100300

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050

Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the December Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,

*/s/ Mariaelena Gayo- Guitian*

Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

**PRINCIPAL CERTIFICATION**

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s December fee statement for certain services rendered and expenses incurred during the period ending December 31, 2020.

/s/ Alvin Velazquez

Name: Alvin Velazquez  
Company: Service Employees International Union  
Dated: February 12, 2021

Exhibit B

Tax Declaration

**DECLARATION**

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., ("GJB" or "Service Provider") with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 ("Miami" or "Main Office"); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 ("Ft. Lauderdale") and 100 N. Tampa Street, Suite 2600, Tampa, Florida ("Tampa"). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.
2. The facts set forth in this declaration are based upon my personal knowledge and the firm's financial records that were reviewed by me or other GJB employees acting under my supervision and direction
3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of December 2020;
4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.
5. GJB's taxable year ends on December 31 (the "Tax Year").
6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.
7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on December 1, 2020 through December 31, 2020, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the "Code");



1. **Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$8,501.15)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	100333	\$42,505.73	\$34,004.58	\$30,604.13	\$8,098.94	\$38,703.07

2. **Puerto Rico Electric Power Authority ("PREPA") 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$3,669.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	100334	\$18,347.50	\$14,678.00	\$13,210.20	\$278.60	\$13,488.80

3. **Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$803.10)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	100335	\$4,015.50	\$3,212.40	\$2,891.16	\$0.00	\$2,891.16

8. The invoices submitted in connection with the December Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$64,868.73 plus costs of \$8,377.54 for a total of \$73,246.27.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$12,973.75 (20% discount). The costs are \$8,377.54. Accordingly, GJB seeks payment of \$46,705.49 in fees (90% of the total discounted fees) and \$8,377.54 in costs (100% of the costs) as detailed in the



December Fee Statement for a total of \$55,083.03.

**IN WITNESS WHEREOF**, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 12<sup>th</sup> day of February, 2021, in Miami, Florida.

A handwritten signature in blue ink, appearing to read "Ken" followed by a stylized surname, positioned above a horizontal line.

KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP  
Eleven Times Square  
New York, NY  
10036  
Attn: Martin J. Bienenstock, Esq.  
Ehud Barak Esq. and

Proskauer Rose LLP,  
70 West Madison  
Street, Chicago, IL  
60602  
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC  
250 Mulioz Rivera Ave., Suite 800  
San Juan, PR 00918  
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz  
LLC MCS Plaza, Suite 500  
255 Ponce de León Ave  
San Juan, PR 00917  
Attn: Luis C. Marini-Biaggi, Esq.  
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa  
500 Tanca Street, Suite 301  
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings  
200 Park Avenue  
New York, NY 10166  
Attn: Luc A. Despina, Esq.

Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC  
El Caribe office Building  
53 Palmeras Street, Ste. 1601  
San Juan, Puerto Rico 00901  
Attn: Juan J . Casillas Ayala, Esq.  
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.  
One East Main Street, Suite 500  
Madison, Wisconsin 53703-3300  
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG  
252 Ponce de Le6n  
Avenue Citibank Tower,  
12th Floor San Juan, PR  
00918  
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico  
Edificio Ochoa  
500 Tanca Street, Suite 301  
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP  
919 Third Ave.  
New York, NY 10022  
Attn: Robert Gordon, Esq.  
Richard Levin, Esq.

and

Jenner & Block LLP  
353 N. Clark Street  
Chicago, IL 60654  
Attn: Catherine Steege, Esq.  
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.  
Edificio Union Plaza, PH-A,  
416 Ave. Ponce de Leon  
Hate Rey, PR 00918  
Attn: A.J. Bennazar-Zequiera, Esq.

Puerto Rico Department of Treasury

Puerto Rico Department of  
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting  
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting  
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax  
Policy  
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy  
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury



March 15, 2021

Via Electronic Mail

The Commonwealth of Puerto Rico  
Puerto Rico Fiscal Agency and Financial Advisory Authority  
c/o O'Melveny & Myers, LLP  
Time Square Tower  
7 Times Square  
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)  
(Jointly Administered) –  
Genovese, Joblove & Battista, P.A. January 2021 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s January 2021 Fee Statement (the “January Fee Statement”) for certain services rendered and expenses incurred during the period ending January 31, 2021.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with the Committee.<sup>1</sup> The amount shown on the attached invoices is reasonable. The services were

---

<sup>1</sup> For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit “A”*** the certification authorizing the submission of the January Fee Statement. Also attached hereto as ***Exhibit “B”*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the January Fee Statement is provided below for your ease of reference.

**1. Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$4,257.30)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	100563	\$21,286.50	\$17,029.20	\$15,326.28	\$0.00	\$15,326.28

**2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$2,134.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	100564	\$10,672.50	\$8,538.00	\$7,684.20	\$0.00	\$7,684.20

**3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$459.30)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	100565	\$2,296.50	\$1,837.20	\$1,653.48	\$0.00	\$1,653.48

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$34,255.50 plus costs of \$0.00 for a total of \$34,255.50. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in January is equal to \$6,851.10. The costs are \$0.00. Accordingly, GJB seeks payment of \$24,663.96 in fees (90% of the total discounted fees) and \$0.00 in costs (100% of the costs) as detailed in the January Fee Statement for a total of \$24,663.96.

Any objections you may have to the January Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10<sup>th</sup> day (or the next business day if such day is not a business day) following service of the January Fee Statement, which is **March 25, 2021** (“Objection Deadline”). If no party serves an objection to the January Statement on GJB and the other Notice Parties attached hereto as ***Exhibit “C”*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$24,663.96 to the following account:

**Wiring and ACH Instructions:**

Beneficiary Bank : First Citizens Bank

ABA Number : 053100300

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050

Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the January Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,

*/s/ Mariaelena Gayo- Guitian*

Mariaelena Gayo-Guitian, Esq.



Exhibit A

Certification

**PRINCIPAL CERTIFICATION**

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s January fee statement for certain services rendered and expenses incurred during the period ending January 31, 2021.

/s/ Alvin Velazquez

Name: Alvin Velazquez  
Company: Service Employees International Union  
Dated: March 15, 2021

Exhibit B

Tax Declaration

### **DECLARATION**

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., ("GJB" or "Service Provider") with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 ("Miami" or "Main Office"); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 ("Ft. Lauderdale") and 100 N. Tampa Street, Suite 2600, Tampa, Florida ("Tampa"). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. The facts set forth in this declaration are based upon my personal knowledge and the firm's financial records that were reviewed by me or other GJB employees acting under my supervision and direction

3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of January 2021;

4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.

5. GJB's taxable year ends on December 31 (the "Tax Year").

6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.

7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on January 1, 2021 through January 31, 2021, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the "Code");

1. **Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$4,257.30)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	100563	\$21,286.50	\$17,029.20	\$15,326.28	\$0.00	\$15,326.28

2. **Puerto Rico Electric Power Authority ("PREPA") 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$2,134.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	100564	\$10,672.50	\$8,538.00	\$7,684.20	\$0.00	\$7,684.20

3. **Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$459.30)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	100565	\$2,296.50	\$1,837.20	\$1,653.48	\$0.00	\$1,653.48

8. The invoices submitted in connection with the January Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$34,255.50 plus costs of \$0.00 for a total of \$34,255.50.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$6,851.10 (20% discount). The costs are \$0.00. Accordingly, GJB seeks payment of \$24,663.96 in fees (90% of the total discounted fees) and \$0.00 in costs (100% of the costs) as detailed in the January Fee

Statement for a total of \$24,663.96.

**IN WITNESS WHEREOF**, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 15<sup>th</sup> day of March, 2021, in Miami, Florida.

  
\_\_\_\_\_  
KEN FORREST

Exhibit C

Notice Parties



Counsel for the Oversight Board

Proskauer Rose LLP  
Eleven Times Square  
New York, NY  
10036  
Attn: Martin J. Bienenstock, Esq.  
Ehud Barak Esq. and

Proskauer Rose LLP,  
70 West Madison  
Street, Chicago, IL  
60602  
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC  
250 Mulioz Rivera Ave., Suite 800  
San Juan, PR 00918  
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz  
LLC MCS Plaza, Suite 500  
255 Ponce de León Ave  
San Juan, PR 00917  
Attn: Luis C. Marini-Biaggi, Esq.  
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa  
500 Tanca Street, Suite 301  
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings  
200 Park Avenue  
New York, NY 10166  
Attn: Luc A. Despina, Esq.



Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC  
El Caribe office Building  
53 Palmeras Street, Ste. 1601  
San Juan, Puerto Rico 00901  
Attn: Juan J . Casillas Ayala, Esq.  
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.  
One East Main Street, Suite 500  
Madison, Wisconsin 53703-3300  
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG  
252 Ponce de Le6n  
Avenue Citibank Tower,  
12th Floor San Juan, PR  
00918  
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico  
Edificio Ochoa  
500 Tanca Street, Suite 301  
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP  
919 Third Ave.  
New York, NY 10022  
Attn: Robert Gordon, Esq.  
Richard Levin, Esq.

and

Jenner & Block LLP  
353 N. Clark Street  
Chicago, IL 60654  
Attn: Catherine Steege, Esq.  
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.  
Edificio Union Plaza, PH-A,  
416 Ave. Ponce de Leon  
Hate Rey, PR 00918  
Attn: A.J. Bennazar-Zequiera, Esq.

Puerto Rico Department of Treasury

Puerto Rico Department of  
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting  
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting  
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax  
Policy  
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy  
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 9, 2020  
Please Refer to  
Invoice Number: 99885

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

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**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-001  
PROMESA - Official Committee of Unsecured Creditors  
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Sep 30, 2020	83,623.00
Costs incurred and advanced	<u>8,294.92</u>
<b>Current Fees and Costs Due</b>	<b>91,917.92</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD***, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ [kforrest@gjb-law.com](mailto:kforrest@gjb-law.com) and requesting written and verbal confirmation.

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ [kforrest@gjb-law.com](mailto:kforrest@gjb-law.com)

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 9, 2020

Please Refer to

Invoice Number: 99885

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Sep 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
09/01/20	JZ	Receipt and review of FOMB's Objection to the UCC's Urgent Motion to Lift Stay to Allow Committee to Pursue Objection to GO Priority [ECF No. 14141]; receipt and review of Ambac Assurance Corps' Partial Joinder to the UCC's Motion to Lift Stay [ECF No. 14142]; circulate same; update electronic case profile.	0.50	195.00	97.50
09/01/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
09/02/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.30	195.00	58.50
09/03/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50
09/04/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
09/08/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
09/09/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
09/09/20	JZ	Receipt and review of the Oversight Board's Status Report Regarding COVID-19 Pandemic and Proposed Disclosure Statement Schedule [ECF No. 14195]; update electronic case profile.	0.30	195.00	58.50
09/10/20	JZ	Receipt and review of the Order Regarding Procedures for September 16-17, 2020 Omnibus Hearing [ECF No. 14202]; calendar deadlines in order; update electronic case profile.	0.40	195.00	78.00
09/10/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
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09/11/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.30	195.00	58.50
09/14/20	JZ	Receipt and review of UCC's Reply in Support of the Urgent Motion to Lift Stay to Allow Committee to Pursue Objection to GO Priority [ECF No. 14237]; circulate same; update electronic case profile.	0.30	195.00	58.50
09/14/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.70	195.00	136.50
09/14/20	JZ	Receipt and review of Court's Notice of Agenda of Matters Scheduled for the Hearing on September 16-17 [ECF No. 14274]; update electronic case profile.	0.40	195.00	78.00
09/15/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
09/15/20	JZ	Receipt and review of AAFAF's Status Report Regarding the Government of Puerto Rico's Recent Activities in Response to the Ongoing COVID-19 Pandemic [ECF No. 14301]; circulate same; update electronic case profile.	0.30	195.00	58.50
09/15/20	JZ	Receipt and review of Oversight Board's Status Report in Connection with September 16-17 Omnibus Hearing [ECF No. 14315]; circulate same; update electronic case profile.	0.30	195.00	58.50
09/16/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50
09/16/20	JZ	Receipt and review of Court's Minute of Proceedings from the 9/16 Omnibus Hearing; update electronic case profile.	0.20	195.00	39.00
09/17/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
09/17/20	JZ	Receipt and review of Court's Order Denying the UCC's Urgent Motion to Lift Stay to Allow Committee to Pursue Objection to GO Priority. The grounds for denial were stated on the record during the 9/16 Omnibus Hearing [ECF No. 14331]; circulate same; update electronic case profile.	0.20	195.00	39.00
09/18/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50
09/21/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
09/22/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50
09/23/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
09/24/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.30	195.00	58.50
09/25/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.30	195.00	58.50

PROMESA - Official Committee of Unsecured Creditors  
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09/28/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
09/29/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.30	195.00	58.50
09/29/20	JZ	Receipt and review of Debtors' Omnibus Motion for Approval of Modifications to the Automatic Stay, which seeks to approve, nunc pro tunc, modifications to the Title III Stay agreed to by the Debtors for the period of August 1, 2020 through September 29, 2020 based on the numerous Lift Stay Notices [ECF No. 14420]; update electronic case profile.	0.20	195.00	39.00
09/29/20	JZ	Receipt and review of Order Regarding Pending Omnibus Objections to Claims [ECF No. 14419]; calendar several hearing dates contained in order; update electronic case profile.	0.30	195.00	58.50
09/30/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.30	195.00	58.50
<b>Subtotal: B110 / Case Administration</b>			12.00		\$2,340.00
<b>B113 / Pleadings Review</b>					
09/01/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 1, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.30	315.00	724.50
09/02/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 2, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (.9); review Fuel Oil litigation summary and proposal circulated by J. Arrastia (.1).	1.00	315.00	315.00
09/03/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 3, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.60	315.00	189.00
09/04/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 4, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.90	315.00	283.50

PROMESA - Official Committee of Unsecured Creditors  
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09/08/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 5 through September 8, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.70	315.00	850.50
09/08/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 9, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.90	315.00	598.50
09/09/20	JAD	Conference call with counsel for Creditors' Committee to discuss status of proceedings, pertinent litigation issues, pending motions, and budget (1.0); review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 9, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (1.3)	2.30	315.00	724.50
09/10/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 10, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.60	315.00	189.00
09/11/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 11, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.80	315.00	882.00
09/12/20	JAD	Continue review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 11 and September 12, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.60	315.00	504.00
09/14/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 12 through September 14, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.90	315.00	913.50
09/15/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 15, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.20	315.00	693.00

PROMESA - Official Committee of Unsecured Creditors  
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09/16/20	JAD	Conference call with counsel for Creditors' Committee to discuss outcome of Omnibus Hearing, status of proceedings, pertinent litigation issues, pending motions, and budget (.8); review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 16, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (1.0)	1.80	315.00	567.00
09/17/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 17, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.90	315.00	283.50
09/18/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 18, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.30	315.00	409.50
09/21/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 19 through September 21, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.30	315.00	409.50
09/22/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 22, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.40	315.00	126.00
09/23/20	JAD	Conference call with counsel for Creditors' Committee to discuss status of proceedings, pertinent litigation issues, pending motions, and budget (.4); review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 23, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (.7)	1.10	315.00	346.50
09/24/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 24, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.50	315.00	157.50
09/28/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 25 through September 28, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.80	315.00	567.00



PROMESA - Official Committee of Unsecured Creditors  
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09/30/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 30, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.40	315.00	441.00
<b>Subtotal: B113 / Pleadings Review</b>			32.30		\$10,174.50
<b>B150 / Meetings of Creditors</b>					
09/09/20	JA	Prepare for and participate in Committee call on litigation issues.	1.10	575.00	632.50
09/16/20	JA	Update to Fuel Oil Litigation (.1); committee call regarding case issues (.9)	0.90	575.00	517.50
09/18/20	JA	Confer with Committee Chair, Luc Despins, Juan Casillas, and Scott Martinez regarding planning for upcoming strategy meeting.	0.90	575.00	517.50
09/23/20	JA	Confer regarding litigation meeting agenda.	0.10	575.00	57.50
09/25/20	JA	Confer with A. Velazquez regarding litigation strategy for presentation to Committee.	0.30	575.00	172.50
09/29/20	JA	Prepare oral presentation on litigation strategy for discussion with Committee.	0.80	575.00	460.00
09/30/20	JA	Presentation on litigation and present litigation strategy to Committee (2.2); confer with Committee Chair regarding continued conference (.1)	2.30	575.00	1,322.50
<b>Subtotal: B150 / Meetings of Creditors</b>			6.40		\$3,680.00
<b>B155 / Court Hearings</b>					
09/15/20	JA	Review agenda of court matters for hearing.	0.20	575.00	115.00
09/16/20	JA	Attend Omnibus hearing on GJB related issues.	1.70	575.00	977.50
<b>Subtotal: B155 / Court Hearings</b>			1.90		\$1,092.50
<b>B160 / Fee/Employment Applications</b>					
09/01/20	CBH	Organization of fee statements.	0.40	195.00	78.00
09/01/20	CE	Preparation and service of the GJB Monthly Fee Objection Statement for June (.6); e-mail same to M. Guitian (.1)	0.70	150.00	105.00
09/02/20	JA	Finalize July Fee Statement and provide to Committee for review.	0.40	575.00	230.00
09/02/20	MGG	Email to and from John Arrastia re: GJB Interim Fee Application and approval of invoices by Committee.	0.30	575.00	172.50

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
Invoice No. 99885

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09/02/20	MGG	Email to and from Valerie Blay Soler re: Billing recap for June Fee Statement.	0.20	575.00	115.00
09/02/20	CBH	Organization of monthly invoices (.4); e-mail correspondence with M. Guitian regarding fee application deadline and omnibus hearing date (.2).	0.60	195.00	117.00
09/10/20	MGG	Review email from John Arrastia re: July bills and September Budget.	0.40	575.00	230.00
09/11/20	JA	Redact Fee Statements for public consumption.	0.80	575.00	460.00
09/14/20	CE	Draft Monthly Fee Statement for July and Declaration. Review July invoices. E-mail correspondence with M. Guitian and K. Forrest re: same.	0.80	150.00	120.00
09/17/20	MGG	Review and serve July Fee Statements and September Budget.	0.40	575.00	230.00
09/17/20	CE	Update July Monthly Fee Statement; E-mail correspondence with M. Guitian and K. Forrest.	0.40	150.00	60.00
09/22/20	CBH	Attention to invoices and bills for June and July 2020; attention to organization of budgets for fee application (.5); meeting with C. Esser regarding outstanding billing statement for August (.5).	1.00	195.00	195.00
09/25/20	CBH	Continue preparation of fourth interim fee application (.5); review of invoices and exhibits (.3).	0.80	195.00	156.00
09/29/20	CBH	Continue preparation of fourth interim fee application (.5); preparation of exhibits; update charts (.5).	1.00	195.00	195.00
<b>Subtotal: B160 / Fee/Employment Applications</b>			8.20		\$2,463.50
<b>B161 / Budgeting</b>					
09/02/20	JA	Prepare budget for Committee review and approval.	0.60	575.00	345.00
09/21/20	JA	Prepare budget for October.	0.60	575.00	345.00
09/24/20	JA	Revise Fee Statements in conformity with Fee Examiner guidelines.	1.10	575.00	632.50
<b>Subtotal: B161 / Budgeting</b>			2.30		\$1,322.50
<b>B191 / General Litigation</b>					
09/01/20	JHG	Review (ECF 14141) FOMB objection to UCC urgent motion regarding GO priority objection.	0.90	765.00	688.50
09/01/20	JMS	Review issues concerning [REDACTED] (9); continued research in support of [REDACTED] to committee (2.2).	3.10	500.00	1,550.00

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
Invoice No. 99885

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09/01/20	AMC	Conduct significant research concerning [REDACTED] [REDACTED].	2.30	375.00	862.50
09/02/20	JHG	Review SRAE limited joinder (ECF 14146) regarding termination of 9019.	0.20	765.00	153.00
09/02/20	JA	Confer with A. Castaldi regarding litigation strategy.	0.20	575.00	115.00
09/02/20	JMS	Continued research in support of [REDACTED] [REDACTED].	2.20	500.00	1,100.00
09/02/20	AMC	Conference with J. Arrastia concerning reply to recent filings in 19-388.	0.20	375.00	75.00
09/03/20	JMS	Work on development of [REDACTED] [REDACTED] and litigation measures.	3.40	500.00	1,700.00
09/04/20	JMS	Research and analysis in support of [REDACTED] [REDACTED].	3.40	500.00	1,700.00
09/08/20	JHG	Strategize with J. Arrastia regarding litigation.	0.40	765.00	306.00
09/08/20	JA	Review Reply of Oversight Board to Joint Status Reports and analyze same (.4); revise Motion for Injunction (1.4); prepare Complaint for Declaratory Relief and Injunction (2.3)	4.70	575.00	2,702.50
09/08/20	JA	Strategize with J. Genovese regarding litigation.	0.40	575.00	230.00
09/09/20	JHG	Review and analysis of proposed UCC draft of reply regarding motion to terminate PREPA 9019.	1.10	765.00	841.50
09/09/20	JHG	Review SCC limited joinder and provide strategic advice to litigation team.	0.40	765.00	306.00
09/09/20	JHG	Review creditor bi-weekly update and email from Alex Bongartz.	0.40	765.00	306.00
09/09/20	JHG	Strategize with J. Arrastia regarding Complaint for Declaratory Relief and Injunction.	1.10	765.00	841.50
09/09/20	JA	Continued preparation of Complaint for Declaratory Relief and Injunction (1.2); strategize with John Genovese (1.1); litigation strategy relating to Injunction as it relates [REDACTED] (.6)	2.90	575.00	1,667.50
09/09/20	AMC	Review Oversight Board's Status Report Regarding COVID-19 Pandemic and Proposed Disclosure Statement Schedule.	0.40	375.00	150.00
09/10/20	JHG	Review email from Alex Bongartz relating to litigation issues.	0.30	765.00	229.50
09/11/20	JHG	Review and analysis of (ECF 14186), order on motion for relief from stay regarding HTA and PRIFA stay relief motion filed by Ambac/Assured.	1.40	765.00	1,071.00

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09/11/20	JHG	Review (ECF 14187), order regarding stay relief and CCDA bonds.	0.80	765.00	612.00
09/11/20	JHG	Review email from Alex Bongartz relating to litigation issues.	0.30	765.00	229.50
09/14/20	JHG	Review (ECF 14263) joint informative motion regarding rejection of power agreements.	0.30	765.00	229.50
09/14/20	JHG	Review joint informative motion (ECF 14264).	0.40	765.00	306.00
09/14/20	JHG	Review and analyze (ECF 14237) UCC reply in support of lift stay regarding GO Bonds.	1.10	765.00	841.50
09/14/20	JHG	Review (ECF 14274) notice of agenda for September 16-17, 2020.	0.30	765.00	229.50
09/15/20	JA	Review Status Report of Oversight Board (.3); review Status Report of AFAAF (.2)	0.50	575.00	287.50
09/16/20	JMS	Research in support of [REDACTED] (2.7), review issues concerning discovery limitations (1.5)	4.20	500.00	2,100.00
09/16/20	AMC	Review / analyze AFAAF's Status Report Regarding the Government of Puerto Rico's Recent Activities in Response to the Ongoing COVID-19 Pandemic	0.40	375.00	150.00
09/16/20	AMC	Review / analyze Oversight Board's Status Report in Connection with September 16-17 Omnibus Hearing	0.40	375.00	150.00
09/16/20	AMC	Review / analyze Eighth Supplemental Verified Statement of the Lawful Constitutional Debt Coalition Pursuant to Federal Rule of Bankruptcy Procedure 2019	0.60	375.00	225.00
09/17/20	JA	Prepare and revise memorandum to client on [REDACTED] issues.	1.60	575.00	920.00
09/18/20	JA	Revise and prepare response and analysis on [REDACTED].	4.10	575.00	2,357.50
09/21/20	JHG	Review status and attachments email from Alex Bongartz.	0.60	765.00	459.00
09/21/20	JHG	Review (ECF 14331) order on urgent motion, review motion and issues to be evaluated March 2021 per status conference.	0.50	765.00	382.50
09/21/20	JHG	Review Doc. 921 ERS memorandum in support of memorandum regarding summary judgment.	1.20	765.00	918.00
09/21/20	JA	Analyze and draft report on litigation strategy [REDACTED]	1.60	575.00	920.00
09/22/20	JHG	Review status email from Alex Bongartz.	0.40	765.00	306.00
09/22/20	JA	Revise, redraft, research and finalize initial working draft of [REDACTED].	4.70	575.00	2,702.50

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09/22/20	JMS	Attention to development of [REDACTED] [REDACTED] issues in support of presentation to Committee.	2.70	500.00	1,350.00
09/23/20	JHG	Review email from J. Arrastia and review and analysis of Bond Trading memorandum and associated agreements referenced.	3.40	765.00	2,601.00
09/23/20	JHG	Review A. Castaldi comments, review [REDACTED] research.	1.50	765.00	1,147.50
09/23/20	JA	Additional comments and revisions to [REDACTED] report (.4); revise report (1.7); research regarding [REDACTED] (1.6); confer with M. Friedman regarding [REDACTED] (.5)	4.20	575.00	2,415.00
09/23/20	JMS	Continued research concerning proposed [REDACTED] [REDACTED] research.	2.60	500.00	1,300.00
09/23/20	MAF	Review draft memorandum to committee regarding [REDACTED] [REDACTED] [REDACTED] (1.3); conference with Arrastia regarding application of [REDACTED] circumstances of memo (.5)	1.80	550.00	990.00
09/23/20	AMC	Review, analyze, and revise internal memorandum concerning [REDACTED].	1.90	375.00	712.50
09/24/20	JHG	Review ECF 14399, informative motion regarding omnibus objection to claims.	0.60	765.00	459.00
09/24/20	JHG	Review ECF 14404, FOMB and Unsecured Creditors motion regarding clarification of litigation deadlines.	0.20	765.00	153.00
09/24/20	JMS	Provide analysis concerning proposed remedies [REDACTED] [REDACTED] report to committee and provide comments to Committee presentation.	2.70	500.00	1,350.00
09/24/20	JA	Review Omnibus Motion to Clarify Litigation Deadlines (.2); draft revise, and edit Memorandum on [REDACTED] (1.2)	1.40	575.00	805.00
09/24/20	JSR	Proofread, edited, and cite-checked the [REDACTED] memo.	2.10	305.00	640.50
09/25/20	JHG	Review (ECF 14407), joint stipulation regarding DRA parties motion for relief from stay.	0.80	765.00	612.00
09/25/20	JMS	Provide additional analysis concerning proposed remedies for [REDACTED] to Committee and provide input to powerpoint presentation.	1.90	500.00	950.00
09/25/20	JA	Revise Report on [REDACTED] issues and additional drafting of working copy (2.1); initial preparation of powerpoint presentation for Committee meeting (1.6)	3.70	575.00	2,127.50
09/25/20	AMC	Revise memorandum discussing [REDACTED] issues.	0.60	375.00	225.00
09/27/20	JMS	Review [REDACTED] and related powerpoint to committee and provide comments.	1.90	500.00	950.00

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09/27/20	JA	Incorporate additional comments and revisions into [REDACTED] (.6); extensive preparation, revision and drafting of [REDACTED] powerpoint presentation (2.1); analysis of [REDACTED] (1.3); confer with A. Velazquez (.1)	4.10	575.00	2,357.50
09/28/20	JHG	Review email from J. Delgado to identify and analyze strategic litigation issues.	0.40	765.00	306.00
09/28/20	JHG	Review and analyze UCC reply in support of urgent objection.	0.60	765.00	459.00
09/28/20	JHG	Review (ECF 14410) regarding 9019 and Covid and provide guidance on litigation matters.	0.40	765.00	306.00
09/28/20	JHG	Review (ECF 14413) order regarding briefing.	0.40	765.00	306.00
09/28/20	JHG	Review (ECF 14407) joint stipulation between government and DRA parties.	0.40	765.00	306.00
09/28/20	AMC	Review of internal materials concerning [REDACTED] and analyze same, reviewing conclusions of memoranda.	0.60	375.00	225.00
09/28/20	AMC	Review of plan and disclosure statement concerning [REDACTED].	0.80	375.00	300.00
09/28/20	AMC	Extensive review of plan support agreements, parties thereto, and comparison of same to [REDACTED].	3.70	375.00	1,387.50
09/29/20	JHG	Review draft Committee PowerPoint Presentation regarding [REDACTED].	1.40	765.00	1,071.00
09/29/20	JHG	Review and analysis of [REDACTED].	1.30	765.00	994.50
09/29/20	JHG	Review and analyze issues regarding lift stay motions.	0.90	765.00	688.50
09/29/20	JHG	Review and analyze issues regarding appeal strategy to First Circuit.	0.90	765.00	688.50
09/29/20	AMC	Review / analysis of [REDACTED].	1.60	375.00	600.00
09/30/20	JA	Analyze [REDACTED] analysis, (1.4); confer with J. Suarez regarding litigation (.8)	2.20	575.00	1,265.00
09/30/20	JMS	Review [REDACTED] memo and research (.8); advise J. Arrastia concerning potential imminent steps [REDACTED] (.8)	1.60	500.00	800.00
09/30/20	AMC	Review of various presentations used in conjunction with upcoming meeting of the Committee of Creditors.	0.80	375.00	300.00

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09/30/20	AMC	Review of Ambac and the Oversight Board's Joint Status Report With Respect to the Rule 2004 Motions (.2), and recent orders concerning clarification of litigation deadlines (.4)	0.60	375.00	225.00
09/30/20	AMC	Supplemental review of [REDACTED] reported therein.	0.60	375.00	225.00
09/30/20	JNS	Received, review, save, calendar and update tracking chart for PetroWest Third Amendment to Tolling Agreement. (.3) Attention to emails from Joyce Delgado regarding documents filed in the last 2 days and set deadlines on those filed documents. (.1)	0.40	75.00	30.00
<b>Subtotal: B191 / General Litigation</b>			111.10		\$62,550.00
<b>Total</b>			<b>174.20</b>		<b>\$83,623.00</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	25.30	765.00	19,354.50
JMS	Jesus M Suarez	Partner	29.70	500.00	14,850.00
MAF	Michael A Friedman	Partner	1.80	550.00	990.00
MGG	Mariaelena Gayo-Guitian	Partner	1.30	575.00	747.50
JA	John Arrastia	Partner	48.10	575.00	27,657.50
JSR	Jeremy S Rosner	Associate	2.10	305.00	640.50
JAD	Joyce A Delgado	Associate	32.30	315.00	10,174.50
AMC	Angelo M Castaldi	Associate	15.50	375.00	5,812.50
JNS	Jessey N Sardina	Paralegal	0.40	75.00	30.00
CE	Carolyn Esser	Paralegal	1.90	150.00	285.00
CBH	Colleen B Hopkins	Paralegal	3.80	195.00	741.00
JZ	Johana Zamora	Paralegal	12.00	195.00	2,340.00
<b>Total</b>			<b>174.20</b>		<b>\$83,623.00</b>

**Costs and incurrent and advanced**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	18.60
	Pacer - Online Research	1,182.60
09/30/2020	Data management and hosting (12272-001) Trustpoint.One 20-09843	7,093.72

**Total Costs incurrent and advanced**

**\$8,294.92**

**Current Fees and Costs**

**\$91,917.92**

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 9, 2020  
Please Refer to  
Invoice Number: 99886

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

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**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services  
for the period ending Sep 30, 2020

91,065.00

Costs incurred and advanced

59.70

**Current Fees and Costs Due**

91,124.70

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD***, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com



**Genovese Joblove & Battista, P.A.**

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Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

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FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Sep 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
09/01/20	JZ	Receipt and review of the Marrero Plaintiff's Motion Submitting Status Report with Proposed Order filed in ADV. 19-388; circulate same; update electronic case profile.	0.30	195.00	58.50
09/01/20	JZ	Receipt and review of PREPA and AAFAF's Joint Objection to the UCC's Motion to Terminate Bankruptcy Rule 9019 Motion [ECF No. 2160]; receipt and review of Statement of Fuel Line Lenders with Respect to the Motion to Terminate [ECF No. 2161]; receipt and review of SREAEE's Limited Joinder to the Motion to Terminate [ECF No. 2162]; circulate same; update electronic case profile.	0.50	195.00	97.50
09/02/20	JZ	Receipt and review of Ankura Consulting Group, LLC, Citigroup Global Markets, Ankura, David Skeel, and Jose Ortiz's Objection to the UCC's Motion to Compel Discovery in Connection with the Motion to Terminate Bankruptcy Rule 9019 [ECF No. 2164]; receipt and review of PREPA and AAFAF's Corrected Joint Objection to the Motion to Terminate the 9019 Motion; circulate same; update electronic case profile.	0.50	195.00	97.50
09/02/20	JZ	Receipt and review of Omnibus Reply in Support of PREPA's Motion for Entry of Order Allowing Administrative Expense Claim for LUMA Energy [ECF No. 2169]; update electronic case profile.	0.20	195.00	39.00
09/03/20	JZ	Receipt and review of UCC's Reply in Support of Urgent Motion to Compel Discovery in Connection with Motion to Terminate Bankruptcy Rule 9019 Motion [ECF No. 2173]; circulate same; update electronic case profile.	0.30	195.00	58.50
09/08/20	JZ	Receipt and review of Court's Order on the UCC's Urgent Motion to Compel Discovery in Connection with the Motion to Terminate Rule 9019 Motion [ECF Mo. 2177]; circulate same; calendar deadline to submit status report; update electronic case profile.	0.40	195.00	78.00

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09/10/20	JZ	Receipt and review of UCC's Urgent Objection to Magistrate Judge's September 5, 2020 Order on Motion to Compel Discovery in Connection with Motion to Terminate Bankruptcy Rule 9019 Motion [ECF No. 2184]; circulate same; update electronic case profile.	0.40	195.00	78.00
09/14/20	JZ	Receipt and review of Order Setting Briefing Schedule on the UCC's Motion to Terminate Rule 9019 Motion [ECF No. 2189]; calendar deadlines contained in order; update electronic case profile.	0.30	195.00	58.50
09/17/20	JZ	Receipt and review of Order Granting PREPA's Omnibus Motion to Rejection Certain PPOAs; calendar bar date for claims; circulate same; update electronic case profile.	0.40	195.00	78.00
09/17/20	JZ	Receipt and review of Court's Memorandum Opinion Regarding PREPA's Rejection Motion [ECF No. 2199]; circulate same; update electronic case profile.	0.40	195.00	78.00
09/18/20	JZ	Receipt and review of Adversary Complaint filed by Complaint by Anne Catesby Jones, Jorge Valdes Llauger against the UCC (.3); circulate same (.1); calendar response deadline (.1); update electronic case profile; e-mails from J. Arrastia regarding monitoring (.1)	0.60	195.00	117.00
09/18/20	JZ	Receipt and review of Respondents' Opposition to the UCC's Urgent Objection to the September 5, 2020 Order on Motion to Compel Discovery in Connection with Motion to Terminate Bankruptcy Rule 9019 Motion [ECF No. 2207]; circulate same; update electronic case profile.	0.30	195.00	58.50
09/22/20	JZ	Receipt and review of Motion to inform filing Adversary Complaint 20-115 filed by the Marrero Plaintiffs; circulate same; update electronic case profile.	0.20	195.00	39.00
09/22/20	JZ	Receipt and review of Notice of Deadline for Filing Proofs of Claim for Rejection Damages [ECF No. 2211]; calendar claims deadline; circulate same; update electronic case profile.	0.30	195.00	58.50
09/23/20	JZ	Receipt and review of Motion to Clarify Litigation Deadlines filed by FOMB and SCC and UCC; update electronic case profile.	0.30	195.00	58.50
09/24/20	JZ	Review of COS filed in ADV 20-0014; numerous e-mails with A. Castaldi and J.. Arrastia regarding PrimeClerk's error by serving the wrong parties; e-mails and phone calls with PrimeClerk to rectify this issue.	0.50	195.00	97.50
09/28/20	JZ	Receipt and review of Order Setting Briefing Schedules on Motion to Clarify Litigation Deadlines [ECF No. 14413]; calendar deadlines; update electronic case profile.	0.30	195.00	58.50
<b>Subtotal: B110 / Case Administration</b>			6.20		\$1,209.00
<b>B150 / Meetings of Creditors</b>					
09/01/20	JA	Prepare correspondence to Committee regarding litigation strategy and issues.	0.90	575.00	517.50

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09/02/20	JA	Prepare correspondence to Committee regarding litigation plan and strategy relating to Fuel Oil Claims.	0.30	575.00	172.50
09/07/20	JA	Email to Committee regarding Reply to Joint Status Report of Defendants and Marrero Plaintiffs.	0.10	575.00	57.50
09/08/20	JA	Provide Status Report to Committee.	0.10	575.00	57.50
09/10/20	JA	Provide Status Report and update regarding litigation and strategy.	0.40	575.00	230.00
09/11/20	JA	Confer with Committee Chair regarding case issues and strategy relating to Fuel Oil.	0.40	575.00	230.00
09/15/20	JA	Prepare status update and litigation report to Committee.	0.20	575.00	115.00
09/21/20	JA	Prepare communications to Committee on new filing AP 115.	0.30	575.00	172.50
09/27/20	JA	Initial preparation of presentation materials for Fuel Oil Litigation to Committee.	2.90	575.00	1,667.50
09/28/20	AMC	Assist with preparation for upcoming meeting of the Committee concerning pending PREPA-related litigation.	0.90	375.00	337.50
<b>Subtotal: B150 / Meetings of Creditors</b>			6.50		\$3,557.50
<b>B191 / General Litigation</b>					
09/01/20	JHG	Review memoranda and orders regarding Marrero intervention.	1.20	765.00	918.00
09/01/20	JHG	Review Marrero class action complaint and analysis.	1.30	765.00	994.50
09/01/20	JHG	Review (ECF 14144) joint objection by PREPA and AAFAF to UCC motion to terminate 9019.	0.80	765.00	612.00
09/01/20	JA	Analyze defendant and Rate Payer Joint Mediation Response (1.2); analyze and strategize regarding case options and litigation plans (2.3); analyze legal research and options (1.9); confer and strategize with J. Suarez, A. Castaldi, and J. Genovese (1.1); prepare options for litigation plan and additional filing of injunctive relief (1.3)	7.80	575.00	4,485.00
09/01/20	JMS	Attention to intervention issues by class action plaintiffs.	2.40	500.00	1,200.00
09/01/20	AMC	Conference call with J. Arrastia, J. Suarez, and J. Genovese regarding going-forward strategy concerning intervention.	1.40	375.00	525.00
09/01/20	AMC	Preliminary research concerning standing issues vis-à-vis creditors seeking to pursue claims of the "Debtor" or the "Debtor's" estate.	1.80	375.00	675.00
09/02/20	JHG	Review opposition to intervene and analysis of Doc 30 in 19-00388.	0.60	765.00	459.00

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09/02/20	JHG	Review and analysis of ECF 71 in 19-00388, joint response by defendants regarding case management.	0.60	765.00	459.00
09/02/20	JA	Continued analysis of [REDACTED] and opposition to defendant and Rate Payer status reports.	1.70	575.00	977.50
09/02/20	JA	Review Response to Response to Motion to Terminate PREPA RSA (.8); strategize (.3); confer with Nick Bassett regarding [REDACTED] (.2)	1.30	575.00	747.50
09/02/20	MAF	Review of email from J Arrastia concerning potential courses of action in responding to intervention of class defendants and analyze potential tasks to be completed regarding same	0.80	550.00	440.00
09/02/20	JMS	Attention to fuel oil litigation relating to intervention (.8) and tolling agreements regarding potential defendants (.8)	1.60	500.00	800.00
09/02/20	AMC	Review and analyze Respondents' Objection to the UCC's Motion to Compel Discovery in Connection with the Motion to Terminate Bankruptcy Rule 9019 [ECF 2155].	0.40	375.00	150.00
09/03/20	JA	Review Reply to Motion to Compel (.6); strategize with N. Bassett of Paul Hastings (.1)	0.70	575.00	402.50
09/03/20	JA	Outline and prepare initial rough draft of Reply to Joint Status Report and Ratepayer and defendant (3.1); review case file of district court proceedings (.9); review prior rulings on Stay (.3)	4.30	575.00	2,472.50
09/03/20	JMS	Attention to fuel oil litigation relating to intervention (1.8) and tolling agreements (.8)	2.60	500.00	1,300.00
09/03/20	AMC	Supplemental research concerning permissive intervention under Rule 24, and detailed review of the parties' positions and briefings concerning the scope of the putative intervenors' intervention.	2.60	375.00	975.00
09/03/20	AMC	Research concerning injunctive relief under s. 362 and s. 105.	3.20	375.00	1,200.00
09/04/20	JHG	Continued analysis relating to research regarding injunctive relief.	1.70	765.00	1,300.50
09/04/20	JHG	Review case history of Fuel Oil litigation and ancillary cases.	1.90	765.00	1,453.50
09/04/20	JA	Prepare and draft Reply to Defendant and Marrero Plaintiffs Joint Status Report (2.3); strategize regarding injunction to prohibit Marrero Plaintiffs from prosecuting claims until resolution of Title III claims (1.2)	3.50	575.00	2,012.50
09/04/20	AMC	Attend to the Committee's reply to the defendants' (in 19-388).	0.70	375.00	262.50
09/04/20	AMC	Initiate drafting complaint for injunctive and declaratory relief.	2.10	375.00	787.50
09/04/20	AMC	Begin drafting motion for preliminary injunction.	3.40	375.00	1,275.00

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09/05/20	JA	Continued preparation of Reply to Joint Status Reports of Defendants and Marrero Plaintiffs (2.3); review Order Denying Motion to Compel Discovery (.1)	2.40	575.00	1,380.00
09/05/20	AMC	Draft motion for preliminary injunction and attend to significant research of bankruptcy authorities concerning the same.	4.80	375.00	1,800.00
09/05/20	AMC	Revise omnibus reply of the Committee to various interested parties' status reports filed in 19-00388.	0.60	375.00	225.00
09/06/20	JA	Continued analysis of Defendant and Marrero Plaintiffs Joint Status Report and preparation of Reply (1.3); several sets of revisions to Reply (1.8); finalize working draft (.6); review and revise draft Motion for Injunctive Relief (1.1)	4.80	575.00	2,760.00
09/06/20	AMC	Finalize initial draft of motion for preliminary injunction and, in conjunction therewith, review of most recent case law governing injunctions under Section 362(a) and 105(a).	11.20	375.00	4,200.00
09/07/20	JA	Analysis of procedural issues relating to prosecution of injunctive relief by UCC as Co-Trustee of PREPA claims.	0.80	575.00	460.00
09/07/20	JA	Finalize working draft of Reply to Status Reports.	0.60	575.00	345.00
09/07/20	JMS	Review draft reply to Motion for Intervention and provide analysis and comments.	1.40	500.00	700.00
09/08/20	JHG	Review joint status and intervention issues.	2.70	765.00	2,065.50
09/08/20	JHG	Review and analyze research prepared by A. Castaldi.	0.90	765.00	688.50
09/08/20	JHG	Review order denying stay relief.	0.40	765.00	306.00
09/08/20	JHG	Review motion for injunctive relief regarding Marrero plaintiffs and analyze legal issues.	2.40	765.00	1,836.00
09/08/20	JHG	Conference with J. Arrastia regarding litigation strategy.	0.40	765.00	306.00
09/08/20	JMS	Review reply to Motion for Intervention and provide comments (.5); research and provide analysis concerning injunctive relief issues in Fuel Oil litigation adv. Marrero Plaintiffs. (1.8)	2.30	500.00	1,150.00
09/08/20	AMC	Revise draft complaint for declaratory relief and injunctive relief.	4.80	375.00	1,800.00
09/08/20	JZ	Revise, format, finalize and file UCC's Omnibus Reply to the Joint Response of the Defendants to the Joint Status Report [ECF No. 73] filed in ADV. 19-388; receipt and review of Special Claims Committee's Limited Joinder to Committee Reply [ECF No. 74]; update electronic case profile.	0.80	195.00	156.00
09/09/20	JHG	Review litigation issues concerning Marrero plaintiffs and provide input to litigation team.	1.10	765.00	841.50

PROMESA - Official Committee of Unsecured Creditors  
12272-002  
Invoice No. 99886

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09/09/20	JMS	Work on development of motion for preliminary injunction for Marrero injunction motion.	1.50	500.00	750.00
09/09/20	AMC	Revise complaint for declaratory and injunctive relief.	1.20	375.00	450.00
09/09/20	AMC	UCC's Reply in Support of the Motion to Terminate Rule 9019 Motion.	0.40	375.00	150.00
09/09/20	JZ	Receipt and review of UCC's Reply in Support of the Motion to Terminate Rule 9019 Motion [ECF No. 2181]; update electronic case profile.	0.30	195.00	58.50
09/10/20	JHG	Review and analysis of revised injunction complaint regarding intervention.	2.60	765.00	1,989.00
09/10/20	JA	Review Motion to Expedite Objection to Order MTC Discovery and objection to Order on Motion to Compel to Dismiss PREPA 9019 (.5); review email from opposing counsel regarding meet and confer (.1); review Motion for Injunctive Relief (1.1); revise working draft of Complaint for Declaratory and Injunctive Relief (.7); finalize working drafts of Complaint and Motion (.7)	3.10	575.00	1,782.50
09/10/20	JMS	Draft revisions to injunction complaint against Marrero Plaintiffs.	2.10	500.00	1,050.00
09/10/20	JA	Review Motion to Expedite Objection to Order MTC Discovery for MTD and Objection to Order.	0.40	575.00	230.00
09/10/20	AMC	Finalize motion for preliminary injunction and complaint for injunctive and declaratory relief.	3.60	375.00	1,350.00
09/10/20	JZ	Draft informative motion of intent to participate at the omnibus hearing on behalf of the UCC; e-mail to J. Arrastia for review.	0.50	195.00	97.50
09/11/20	JHG	Review draft complaint for injunction and conference with A. Castaldi regarding same.	2.10	765.00	1,606.50
09/11/20	JA	Review Order on Motion to Terminate Rule 9019 Motion (.1); review Order on Briefing Schedule (.1)	0.20	575.00	115.00
09/11/20	JMS	Draft revisions to injunction Complaint and Motion for Preliminary Injunction against Marrero Plaintiffs.	2.40	500.00	1,200.00
09/11/20	JZ	Receipt and review of Order Setting Briefing Schedule on the UCC's Objection to Order on Motion to Compel Discovery in Connection with Motion to Terminate Bankruptcy Rule 9019 Motion [ECF No. 2188]; circulate order; calendar deadlines; conference with J. Arrastia regarding future filings and strategy in related PREPA adversary cases.	0.80	195.00	156.00
09/14/20	JA	Extensive review and revision of Adversary Complaint and Motion for Injunction (3.8); prepare Informative Motion (.6); confer and strategize with J. Suarez regarding Complaint (.5)	4.90	575.00	2,817.50
09/14/20	JMS	Revise draft complaint against Class Action Plaintiffs (3.2); revise draft Motion for Preliminary Injunction (2.8); review final issues and coordinate filing (1.4)	7.40	500.00	3,700.00

PROMESA - Official Committee of Unsecured Creditors  
12272-002  
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09/14/20	JZ	Finalize and file Motion to Inform Filing of Related Adversary Proceeding To Enjoin Proposed Intervenor; circulate same; update electronic case profile.	0.40	195.00	78.00
09/14/20	JZ	Conference with J. Arrastia regarding new adversary filing; draft Civil Cover Sheet; revise, format, finalize with exhibits and file Adversary Complaint (ADV. 20-114); revise, format, finalize with Exhibits and file Motion for Injunction; update electronic case profile.	1.00	195.00	195.00
09/15/20	JA	Create litigation strategy and plan for case prosecution in 388 and 114.	1.30	575.00	747.50
09/15/20	JMS	Attention to prosecution of adversary complaint against Class Action Plaintiffs (.8); status of service (.4) and coordination with SCC (.7)	1.90	500.00	950.00
09/16/20	JA	Strategize regarding immediate action steps.	0.40	575.00	230.00
09/16/20	JZ	Conduct Westlaw PeopleMap research to obtain Defendants current address; draft summons in ADV. 20-144; draft and file Notice of Filing Summons for Issuance; update electronic case profile.	0.60	195.00	117.00
09/17/20	JZ	Receipt of issued summons; create service package of all documents to be served; e-mail same to PrimeClerk for service.	0.50	195.00	97.50
09/18/20	JHG	Review ECF 14338, response to Fuel Line lenders regarding Prepa administrative expense motions.	0.30	765.00	229.50
09/18/20	JHG	Review stay order regarding Prepa litigation.	0.30	765.00	229.50
09/18/20	JHG	Review litigation and strategic issues regarding PREPA causes of action.	0.60	765.00	459.00
09/18/20	JA	Receive and review Complaint in AP 115 (.6); analyze same (.3); confer with SCC counsel (.1); confer with client (.2)	1.20	575.00	690.00
09/18/20	JA	Review Respondent's Opposition to UCC's Urgent Motion to Magistrate's Order on Motion to Compel Discovery.	0.40	575.00	230.00
09/18/20	JMS	Review complaint filed by Class Action Plaintiffs against UCC and consider impact on Fuel Oil and Stay Litigation.	1.80	500.00	900.00
09/18/20	AMC	Review of Marrero plaintiffs' adversary complaint and corresponding informative motion	0.80	375.00	300.00
09/21/20	JA	Strategize regarding litigation plan.	0.80	575.00	460.00
09/21/20	JMS	Revise complaint and motion for preliminary injunction and prepare for filing in Marrero Class Injunction Complaint.	5.30	500.00	2,650.00
09/21/20	JA	Prepare informative motion on filing of AP114 (.3); review court Order in AP115 regarding §362 (.1)	0.40	575.00	230.00



PROMESA - Official Committee of Unsecured Creditors  
12272-002  
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09/21/20	AMC	Review of order entered by Judge Swain concerning Marrero Plaintiffs' adversary complaint, and brief research concerning s. 362(e ).	0.40	375.00	150.00
09/22/20	AMC	Research concerning stay and consolidation issues regarding Marrero plaintiffs' Adv. Case No. 20-00115.	2.10	375.00	787.50
09/22/20	AMC	Draft motion to consolidate / motion to stay proceedings re: Adv. No. 20-114 and Adv. No. 20-115.	4.10	375.00	1,537.50
09/24/20	JMS	E-mail to class action plaintiffs (.4) and attention to service of process issues (1.2)	1.60	500.00	800.00
09/25/20	JA	Review Reply to Objection on Order regarding Motion to Compel Discovery for MTD 9019.	0.30	575.00	172.50
09/25/20	JA	Review Status Report of FOMB on pandemic and Covid-19.	0.20	575.00	115.00
09/25/20	JMS	Attention to issues relating to service of process and litigation timelines in Marrero Class Injunction Complaint.	2.70	500.00	1,350.00
09/25/20	JZ	Receipt and review of Government Parties' Status Report Regarding the COVID-19 Pandemic and the 9019 Motion [ECF No. 2220]; circulate same; update electronic case profile.	0.20	195.00	39.00
09/25/20	JZ	Receipt and review of UCC's Reply in Support of its Urgent Objection to the Magistrate Judge's September 4, 2020 Order on Motion to Compel Discovery in Connection with the Motion to Terminate Rule 9019 Motion [ECF No. 2219]; circulate same; update electronic case profile.	0.30	195.00	58.50
09/28/20	JHG	Review issues regarding Prepa Fuel Oil case and status of stay.	1.30	765.00	994.50
09/28/20	JA	Revise and finalize powerpoint presentation on Fuel Oil litigation strategy (1.8); address issues of defendants without tolling agreements (.3); prepare for presentation to Committee (.8)	2.90	575.00	1,667.50
09/28/20	JMS	Review issues related to expiring tolling agreements and renewal of same.	1.40	500.00	700.00
09/29/20	JMS	Conclude issues related to expiring tolling agreement and renewal of same.	0.50	500.00	250.00
09/29/20	JA	Address Tolling Agreements that are expiring and follow up.	0.20	575.00	115.00
09/29/20	AMC	Continue preparation of motion for consolidation.	1.30	375.00	487.50
09/30/20	JMS	Review status of Class Action plaintiffs litigation against UCC/SCC, research and advise J. Arrastia concerning potential litigation actions.	1.40	500.00	700.00
09/30/20	JA	Attention to service issues of AP 114.	0.20	575.00	115.00



PROMESA - Official Committee of Unsecured Creditors  
12272-002  
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09/30/20	AMC	Research concerning stays of litigation and predicates for said relief.	1.30	375.00	487.50
<b>Subtotal: B191 / General Litigation</b>			166.70		\$84,726.00
<b>B260 / Meetings of and Communications with Board</b>					
09/02/20	JA	Confer and strategize with Tristan Axelrod of SCC regarding strategy in response to position of Ratepayer and defendants.	0.60	575.00	345.00
09/07/20	JA	Email to Special Claims Committee counsel regarding draft Reply (.1); email to special Claims counsel regarding injunctive relief as to Marrero Plaintiffs.	0.20	575.00	115.00
09/08/20	JA	Confer with Tristan Axelrod regarding litigation coordination (.1); finalize and file Reply to Joint Motion (.3)	0.40	575.00	230.00
09/10/20	JA	Confer with SCC counsel regarding proposed motion and complaint for injunctive relief.	0.10	575.00	57.50
09/12/20	JA	Confer with SCC counsel regarding oral argument on Joint Status Report.	0.10	575.00	57.50
09/15/20	JA	Confer with SCC regarding potential joinder to Adversary proceeding 114.	0.20	575.00	115.00
09/15/20	JMS	Provide information to SCC concerning Marrero plaintiff litigation.	0.50	500.00	250.00
09/16/20	JA	Confer with SCC counsel regarding Fuel Oil Litigation.	0.10	575.00	57.50
09/23/20	JA	Confer with T. Axelrod of SCC counsel regarding Fuel Oil issues relating to AP 114, AP 115 and AP 388.	0.50	575.00	287.50
09/24/20	JA	Review correspondence from T. Alexrod regarding inquiry from Marrero Plaintiffs.	0.10	575.00	57.50
<b>Subtotal: B260 / Meetings of and Communications with Board</b>			2.80		\$1,572.50
<b>Total</b>			<b>182.20</b>		<b>\$91,065.00</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	23.20	765.00	17,748.00
JMS	Jesus M Suarez	Partner	40.80	500.00	20,400.00
MAF	Michael A Friedman	Partner	0.80	550.00	440.00
JA	John Arrastia	Partner	52.70	575.00	30,302.50
AMC	Angelo M Castaldi	Associate	53.10	375.00	19,912.50
JZ	Johana Zamora	Paralegal	11.60	195.00	2,262.00
<b>Total</b>			<b>182.20</b>		<b>\$91,065.00</b>

**Costs and incurrent and advanced**

PROMESA - Official Committee of Unsecured Creditors  
12272-002  
Invoice No. 99886

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<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Pacer - Online Research	59.70
<b>Total Costs incurrent and advanced</b>		<b>\$59.70</b>
<b>Current Fees and Costs</b>		<b>\$91,124.70</b>

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 9, 2020  
Please Refer to  
Invoice Number: 99887

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the  
~~Government - Commonwealth of Puerto Rico~~

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**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-003

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government  
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services  
for the period ending Sep 30, 2020

13,579.50

Costs incurred and advanced

**Current Fees and Costs Due**

13,579.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.***

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 9, 2020

Please Refer to

Invoice Number: 99887

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the  
~~Government Commonwealth of Puerto Rico~~

---

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Sep 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
09/10/20	JZ	Receipt and review of the Urgent Joint Motion for Leave to Exceed Page Limits for Opening Summary Judgment Briefing with Respect to Certain Issues Raised in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by ERS filed in ADV. 19-356, 19-357, 19-359, 19-361 and 19-367; update each electronic case profile.	0.40	195.00	78.00
09/11/20	JZ	(RE: ADV. 19-357) Receipt and review of ERS Bondholders Motion For Partial Summary Judgment On Ultra Vires Issues And Proceedings [ECF No. 120]; receipt and review of ERS Bondholders Rule 56(B) Statement Of Undisputed Facts In Support Of Motion For Partial Summary Judgment [ECF No. 121]; receipt and review of Declaration Of Sparkle L. Sooknanan in Support Of ERS Bondholders Motion For Partial Summary Judgment (2,171 pages) [ECF No. 122]; receipt and review of Declaration of Dr. W. Bartley Hildreth in Support of Motion for Summary Judgment [ECF No. 123]; receipt and review of Declaration of Dr. Laura Gonzalez in Support of Motion For Partial Summary Judgment [ECF No. 124]; receipt and review of Committees' Motion for Summary Judgment on Ultra Vires Issues [ECF No. 125]; receipt and review of Committees' Statement of Undisputed Material Facts in Support of Motion for Summary Judgment [ECF No. 126]; receipt and review of Declaration of Nicholas A. Bassett in Support of Committee's Motion for Summary Judgment (1,884 pages) [ECF No. 127]; calendar objection deadline; index same and update electronic case profile.	0.90	195.00	175.50

PROMESA - Official Committee of Unsecured Creditors  
12272-003  
Invoice No. 99887

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09/11/20	JZ	(RE: ADV. 19-359) Receipt and review of ERS Bondholders Motion For Partial Summary Judgment On Ultra Vires Issues And Proceedings [ECF No. 99]; receipt and review of ERS Bondholders Rule 56(B) Statement Of Undisputed Facts In Support Of Motion For Partial Summary Judgment [ECF No. 100]; receipt and review of Declaration Of Sparkle L. Sooknanan in Support Of ERS Bondholders Motion For Partial Summary Judgment (2,171 pages) [ECF No. 101]; receipt and review of Declaration of Dr. W. Bartley Hildreth in Support of Motion for Summary Judgment [ECF No. 102]; receipt and review of Declaration of Dr. Laura Gonzalez in Support of Motion For Partial Summary Judgment [ECF No. 103]; receipt and review of Committees' Motion for Summary Judgment on Ultra Vires Issues [ECF No. 104]; receipt and review of Committees' Statement of Undisputed Material Facts in Support of Motion for Summary Judgment [ECF No. 105]; receipt and review of Declaration of Nicholas A. Bassett in Support of Committee's Motion for Summary Judgment (1,884 pages) [ECF No. 106]; calendar objection deadline; index same and update electronic case profile.	0.90	195.00	175.50
09/11/20	JZ	(RE: ADV. 19-361) Receipt and review of ERS Bondholders Motion For Partial Summary Judgment On Ultra Vires Issues And Proceedings [ECF No. 102]; receipt and review of ERS Bondholders Rule 56(B) Statement Of Undisputed Facts In Support Of Motion For Partial Summary Judgment [ECF No. 103]; receipt and review of Declaration Of Sparkle L. Sooknanan in Support Of ERS Bondholders Motion For Partial Summary Judgment (2,171 pages) [ECF No. 104]; receipt and review of Declaration of Dr. W. Bartley Hildreth in Support of Motion for Summary Judgment [ECF No. 105]; receipt and review of Declaration of Dr. Laura Gonzalez in Support of Motion For Partial Summary Judgment [ECF No. 106]; receipt and review of Committees' Motion for Summary Judgment on Ultra Vires Issues [ECF No. 107]; receipt and review of Committees' Statement of Undisputed Material Facts in Support of Motion for Summary Judgment [ECF No. 108]; receipt and review of Declaration of Nicholas A. Bassett in Support of Committee's Motion for Summary Judgment (1,884 pages) [ECF No. 109]; calendar objection deadline; index same and update electronic case profile.	0.90	195.00	175.50

PROMESA - Official Committee of Unsecured Creditors  
12272-003  
Invoice No. 99887

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09/11/20	JZ	(RE: ADV. 19-356) Receipt and review of ERS Bondholders Motion For Partial Summary Judgment On Ultra Vires Issues And Proceedings [ECF No. 115]; receipt and review of ERS Bondholders Rule 56(B) Statement Of Undisputed Facts In Support Of Motion For Partial Summary Judgment [ECF No. 116]; receipt and review of Declaration Of Sparkle L. Sooknanan In Support Of ERS Bondholders Motion For Partial Summary Judgment (2,171 pages) [ECF No. 117]; receipt and review of Declaration of Dr. W. Bartley Hildreth in Support of Motion for Summary Judgment [ECF No. 118]; receipt and review of Declaration of Dr. Laura Gonzalez in Support of Motion For Partial Summary Judgment [ECF No. 119]; receipt and review of Committees' Motion for Summary Judgment on Ultra Vires Issues [ECF No. 120]; receipt and review of Committees' Statement of Undisputed Material Facts in Support of Motion for Summary Judgment [ECF No. 121]; receipt and review of Declaration of Nicholas A. Bassett in Support of Committee's Motion for Summary Judgment (1,884 pages) [ECF No. 122]; calendar objection deadline; index same and update electronic case profile.	1.00	195.00	195.00
09/11/20	JZ	(RE: ADV. 19-00367) Receipt and review of Plaintiff's Motion for Summary Judgment [ECF No. 107]; receipt and review of Plaintiff's Memorandum of Law in Support of Motion for Summary Judgment [ECF No. 108]; receipt and review of Plaintiff's Motion Submitting Statement of Material Undisputed Facts Memorandum of Law in Support of Motion for Summary Judgment [ECF No 109]; receipt and review of Joinder Of Plaintiff-Intervenor The Official Committee Of Retired Employees in Support of Motion for Summary Judgment [ECF No. 110]; receipt and review of Defendants Motion For Partial Summary Judgment On Lien Scope Issues [ECF No. 111]; receipt and review of Motion Submitting Defendants Rule 56(B) Statement Of Undisputed Facts In Support Of Defendants Motion For Partial Summary Judgment On Lien Scope Issues [ECF No. 112]; receipt and review of Declaration Of Sparkle L. Sooknanan In Support Of Defendants Motion For Partial Summary Judgment On Lien Scope Issues (1,335 pages, 34 exhibits) [ECF No. 113]; receipt and review of Declaration Of Antonio L. Argiz In Support Of Defendants Motion For Partial Summary Judgment On Lien Scope Issues (756 pages) [ECF No. 114]; calendar objection deadline; index and update electronic case profile.	1.20	195.00	234.00
09/18/20	JZ	Receipt and review of Defendant 7Y's Joinder to the ERS Bondholders' Motion for Partial Summary Judgment on Ultra Vires Issues and Proceedings filed in ADV. 19-00356; update electronic case profile.	0.30	195.00	58.50
09/18/20	JZ	Receipt and review of Defendant Roche's Joinder to the ERS Bondholders' Motion for Partial Summary Judgment filed in ADV. 19-00361; update electronic case profile.	0.30	195.00	58.50
09/18/20	JZ	Receipt and review of Defendant Noria Osorio de Cordero's to the ERS Bondholders' Motion for Partial Summary Judgment filed in ADV. 19-00357; update electronic case profile.	0.30	195.00	58.50

PROMESA - Official Committee of Unsecured Creditors  
12272-003  
Invoice No. 99887

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<b>Subtotal: B110 / Case Administration</b>			6.20		\$1,209.00
<b>B190 / Other Contested Matters</b>					
09/09/20	JA	Review draft Summary Judgment regarding ERS Bonds (1.8); review government lien scope MSJ (.6)	2.40	575.00	1,380.00
<b>Subtotal: B190 / Other Contested Matters</b>			2.40		\$1,380.00
<b>B191 / General Litigation</b>					
09/09/20	JHG	Review draft motion for summary judgment on ultra vires issues and provide guidance to litigation team.	3.30	765.00	2,524.50
09/10/20	JHG	Review draft memorandum regarding motion for summary judgment and lien issues.	2.20	765.00	1,683.00
09/10/20	JA	Confer with N. Bassett at Paul Hastings regarding coordination on Motion for Summary Judgment on Ultra Vires issues.	0.10	575.00	57.50
09/11/20	JA	Motion for Summary Judgment by FOMB (.4); review Committee's Motion for Summary Judgment on Ultra Vires in various AP (2.8); review ERS Bondholders' Motion for Partial Summary Judgment in AP 361 (.3); review defendants' Motion for Partial MSJ on Lien Scope Issues (.4); review statement of material undisputed facts of ERS (1.6); memorandum of ERS in support of MSJ (2.1)	7.60	575.00	4,370.00
09/12/20	JA	Review affidavit in support of ERS Bondholders' Motion for Summary Judgment (.6); review MSJ by BNY Mellon and supporting documents (1.1); review additional Motions for Summary Judgment filed by UCC in other AP handled by GJB (.6)	2.30	575.00	1,322.50
09/17/20	JA	Review Motion for Joinder.	0.10	575.00	57.50
09/18/20	JA	Review Motion for Joinder.	0.10	575.00	57.50
09/22/20	JHG	Review Doc. 79 in 17-00970 United States opposition to ERS bondholders.	1.20	765.00	918.00
<b>Subtotal: B191 / General Litigation</b>			16.90		\$10,990.50
<b>Total</b>			<b>25.50</b>		<b>\$13,579.50</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	6.70	765.00	5,125.50
JA	John Arrastia	Partner	12.60	575.00	7,245.00
JZ	Johana Zamora	Paralegal	6.20	195.00	1,209.00
<b>Total</b>			<b>25.50</b>		<b>\$13,579.50</b>

PROMESA - Official Committee of Unsecured Creditors  
12272-003  
Invoice No. 99887

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**Current Fees and Costs**

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**\$13,579.50**



**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 9, 2020  
Please Refer to  
Invoice Number: 99888

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

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**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-004

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

(Services rendered outside of Puerto Rico)

For fees for professional services  
for the period ending Sep 30, 2020

403.50

Costs incurred and advanced

**Current Fees and Costs Due**

403.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.***

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 9, 2020

Please Refer to

Invoice Number: 99888

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation  
Authority

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FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Sep 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B191 / General Litigation</b>					
09/15/20	JHG	Review (ECF 14315) Oversight Board status responses and AAFAF for Oversight Board and HTA (ECF 17-03283).	0.40	765.00	306.00
09/23/20	JZ	Receipt and review of Motions file in the HTA matter by Monoline; update electronic case profile.	0.20	195.00	39.00
09/28/20	JZ	Receipt and review of Joint Stipulation of the Government and DRA Parties Regarding the DRA Parties' Motion and Memorandum of Law in Support of Their Motion for Relief From the Automatic Stay or, in the Alternative, Ordering Payment of Adequate Protection [ECF No. 930]; receipt and review of Court Order Granting same and setting deadline [ECF No. 931]; calendar deadline; update electronic case profile.	0.30	195.00	58.50
<b>Subtotal: B191 / General Litigation</b>			<b>0.90</b>		<b>\$403.50</b>
<b>Total</b>			<b>0.90</b>		<b>\$403.50</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	0.40	765.00	306.00
JZ	Johana Zamora	Paralegal	0.50	195.00	97.50
<b>Total</b>			<b>0.90</b>		<b>\$403.50</b>

**Current Fees and Costs**

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**\$403.50**

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 23, 2020  
Please Refer to  
Invoice Number: 100020

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

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**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-001  
PROMESA - Official Committee of Unsecured Creditors  
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Oct 31, 2020	104,209.00
Costs incurred and advanced	<u>7,331.55</u>
<b>Current Fees and Costs Due</b>	<b>111,540.55</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.***

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 23, 2020

Please Refer to

Invoice Number: 100020

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Oct 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
10/01/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.30	195.00	58.50
10/02/20	JZ	Receipt and review of UCC's Supplemental Brief Regarding Status Report of Government Parties [ECF No. 14447]; circulate same; update electronic case profile.	0.30	195.00	58.50
10/02/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50
10/02/20	JZ	Receipt and review of the Notice of Hearing on Motion of UCC for Reconsideration of September 17, 2020 Order Denying Motion to Lift Stay to Allow Committee to Pursue Priority Objection to GO Bond Claims [ECF No. 14444]; calendar hearing date and objection deadline; update electronic case profile.	0.30	195.00	58.50
10/05/20	JZ	Receipt and review of Motion of National Public Finance Guarantee Corporation for Entry of an Order Directing an Independent Investigation [ECF No. 14450]; receipt of Notice of Filing on same [ECF No. 14451]; calendar hearing date and objection deadline; update electronic case profile.	0.50	195.00	97.50
10/05/20	JZ	Receipt and review of Order Denying UCC's Motion, Under Federal Rule of Bankruptcy Procedure 9023, for Reconsideration of September 17, 2020 Order Denying Motion to Lift Stay to Allow Committee to Pursue Priority Objection to GO Bond Claims [ECF No. 14452]; circulate same; update electronic case profile.	0.30	195.00	58.50
10/05/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.30	195.00	58.50
10/06/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50

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10/06/20	JZ	Receipt and review of Joint Motion of PSA Creditors Pursuant to Section 312 of PROMESA and Section 105 of the Bankruptcy Code to Impose Deadlines for Plan of Adjustment [ECF No. 14478]; receipt and review of the Notice of Filing on said motion [ECF No. 14479]; calendar hearing date and objection deadline; circulate same; update electronic case profile.	0.50	195.00	97.50
10/06/20	JZ	Receipt and review of Oversight Board's Objection to Ambac Assurance Corp's Motion to Strike Certain Provisions of the Amended PSA by and among the Oversight Board, Certain GO Holders, and Certain PBA Holders [ECF No. 14460]; receipt and review of AAFAF's Statement of Position regarding the Motion to Strike [ECF No. 14465]; circulate same; update electronic case profile.	0.40	195.00	78.00
10/07/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
10/08/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50
10/08/20	JZ	Receipt and review of Eighth Supplemental Verified Statement of the Ad Hoc Group of Constitutional Debtholders Pursuant to Rule 2019 [ECF No. 14520]; update electronic case profile.	0.20	195.00	39.00
10/09/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
10/12/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50
10/13/20	JZ	Receipt and review of FOMB's response to National Public Finance Corporation for Entry of an Order Directing an Independent Investigation Regarding Certain Trading Investigation and the UCCs joinder thereto [ECF No. 14539]; receipt and review of QTCB's Objection to the Independent Investigation Motion [ECF No. 1455]; receipt and review of AD Hoc Group's Objection to the Independent Investigation Motion [ECF No. 14556]; receipt and review of Sculptor's Response to the Independent Investigation Motion [ECF No. 14554]; circulate filings; update electronic case profile	0.60	195.00	117.00
10/13/20	JZ	Receipt and review of Oversight Board's Objection to Joint Motion of PSA Creditors to Impose Deadlines for Plan of Adjustment [ECF No. 14547]; receipt and review of similar objections to the motion filed by Ambac [ECF No. 14559], AAFAF [ECF No. 14558], and National Public Finance [ECF No. 14555]; circulate same; update electronic case profile.	0.60	195.00	117.00
10/13/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
10/14/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00

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10/14/20	JZ	Receipt and review of LCDC's Urgent Motion to File Under Seal Certain Portions of its Objection to National's Investigation Motion [ECF No. 14567]; receipt and review of Ad Hoc Group of Constitutional Debtholders' Joinder to the Objections to the Investigation Motion [ECF No. 14570]; circulate same; update electronic case profile.	0.40	195.00	78.00
10/15/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50
10/16/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50
10/19/20	JZ	Receipt and review of the Joint Response to the UCC's Urgent Motion for Order Under Bankruptcy Rule 2004 Authorizing Discovery Concerning Bond Trading filed by the Ad Hoc Group of Constitutional Debtholders, the Ad Hoc Group of GO Bondholders, the LCDC, and the QTBC Noteholder Group [ECF No. 14604] (.3); receipt and review of Order of Reference to Magistrate Judge referring the UCC's Urgent Motion to Magistrate Judge Judith Dein [ECF No. 14605]; receipt and review of Order Denying UCC's Motion to Expedite and Motion for Rule 2004 without Prejudice [ECF No. 14613] (.2); circulate same (.1); update electronic case profile (.1)	0.70	195.00	136.50
10/19/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.30	195.00	58.50
10/20/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50
10/20/20	JZ	Conference with J. Arrastia regarding upcoming deadlines; draft e-mail outlining same.	0.40	195.00	78.00
10/21/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
10/22/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50
10/23/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
10/26/20	JZ	Receipt and review of Notice of Agenda of Matters Scheduled for Hearing on October 28th [ECF NO. 14930]; circulate same; update electronic case profile.	0.30	195.00	58.50
10/26/20	JZ	Receipt and review of Status Report of Financial Oversight and Management Board for Puerto Rico Regarding COVID-19 Pandemic and Proposed Disclosure Statement Schedule [ECF No. 14923]; circulate same; update electronic case profile.	0.20	195.00	39.00
10/26/20	JZ	Receipt and review of Mediation Team's statement regarding National Public Finance Guarantee Corporation's Motion for Entry of an Order Directing an Independent Investigation [ECF No. 14929]; circulate same; update electronic case profile.	0.20	195.00	39.00

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10/27/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
10/27/20	JZ	Receipt and review of LCDC's reply to the numerous responses to the Motion to Seal [ECF No. 14932]; circulate same; update electronic case profile.	0.30	195.00	58.50
10/28/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.30	195.00	58.50
10/28/20	JZ	Receipt and review of the Order Denying National's Motion for Entry of an Order Directing an Independent Investigation [ECF No. 14976]; circulate same; update electronic case profile.	0.30	195.00	58.50
10/29/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.50	195.00	97.50
10/30/20	JZ	Review of daily summary prepared by J. Delgado and calendar deadlines and events as appropriate.	0.40	195.00	78.00
<b>Subtotal: B110 / Case Administration</b>			15.40		\$3,003.00
<b>B113 / Pleadings Review</b>					
10/01/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 1, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	0.50	315.00	157.50
10/02/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 2, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	0.90	315.00	283.50
10/05/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 5, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	1.30	315.00	409.50
10/06/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 6, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	1.40	315.00	441.00
10/07/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 7, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	1.40	315.00	441.00

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10/08/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 8, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	2.90	315.00	913.50
10/09/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 9, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	1.50	315.00	472.50
10/12/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 10 through October 12, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.20	315.00	378.00
10/13/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 13, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.20	315.00	693.00
10/14/20	JAD	Conference call with counsel for Creditors' Committee to discuss status of proceedings, pertinent litigation issues, pending motions, and budget (1.1); review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 14, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (1.2)	2.30	315.00	724.50
10/15/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 15, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.60	315.00	504.00
10/16/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 16, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	1.40	315.00	441.00
10/19/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 17 through October 19, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	1.20	315.00	378.00



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10/20/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 20, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	1.10	315.00	346.50
10/21/20	JAD	Conference call with counsel for Creditors' Committee to discuss status of proceedings, pertinent litigation issues, pending motions, and budget (.6); review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 21, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (1.2)	1.80	315.00	567.00
10/28/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 23 through October 28, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (3.2)	3.20	315.00	1,008.00
10/29/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 29, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.60	315.00	819.00
10/30/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 30, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.90	315.00	283.50
<b>Subtotal: B113 / Pleadings Review</b>			29.40		\$9,261.00
<b>B150 / Meetings of Creditors</b>					
10/02/20	JA	Confer with A. Velasquez regarding litigation issues.	0.40	575.00	230.00
10/05/20	JA	Confer with A. Velasquez regarding update on litigation issues.	0.40	575.00	230.00
10/07/20	JA	Confer with Committee regarding litigation strategy (.9); confer with A. Velazquez (.3)	1.20	575.00	690.00
10/08/20	JHG	Review presentation to committee regarding bond analysis.	1.10	765.00	841.50
10/08/20	JA	Confer with A. Velasquez (2x) regarding National update (.9); prepare update to Committee (.4)	1.30	575.00	747.50
10/09/20	JA	Prepare update to Committee regarding status (.3)	0.30	575.00	172.50

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10/13/20	JA	Prepare update to client regarding objections and responses to National Motion for Investigation and Joinder.	0.70	575.00	402.50
10/14/20	JA	Committee call regarding litigation strategy.	1.10	575.00	632.50
10/19/20	JA	Confer with Committee regarding litigation update.	0.30	575.00	172.50
10/21/20	JA	Prepare litigation update to Committee and drafts of materials (.3); Committee call regarding case issues and litigation (.7); additional correspondence and update to Committee (.2)	1.20	575.00	690.00
10/23/20	JA	Confer with Committee regarding updates on Orders and status of Investigation Motion.	0.30	575.00	172.50
10/28/20	JA	Provide Committee with strategy and litigation update regarding pending issues	0.60	575.00	345.00
<b>Subtotal: B150 / Meetings of Creditors</b>			8.90		\$5,326.50
<b>B155 / Court Hearings</b>					
10/21/20	AMC	Research and support in preparation for argument on UCC Joinder to National Motion to Appoint Examiner.	1.10	375.00	412.50
10/28/20	JA	Prepare for argument on UCC Joinder to National Motion to Appoint Examiner (1.2); Attend Omnibus Hearing and participate in oral argument (2.1);	3.20	575.00	1,840.00
<b>Subtotal: B155 / Court Hearings</b>			4.30		\$2,252.50
<b>B160 / Fee/Employment Applications</b>					
10/01/20	CBH	Continue preparation of fourth interim fee application; attention to monthly invoices; break down amounts for exhibits to application.	1.50	195.00	292.50
10/05/20	CBH	E-mail correspondence with M. Guitian regarding fee application deadline and updates regarding status; review of timekeepers; send list to M. Guitian.	0.60	195.00	117.00
10/20/20	MGG	Review and serve November Budget on Fee Examiner.	0.20	575.00	115.00
10/20/20	CBH	E-mail correspondence with M. Guitian regarding August and September time for fee application; meeting with C. Esser regarding August invoice; review of fee application.	0.60	195.00	117.00
10/20/20	CE	Review August invoices. Prepare GJB Monthly Fee Statement for August including exhibits. E-mail correspondence with K. Forrest and M. Guitian.	1.00	150.00	150.00
10/23/20	CBH	Continue preparation of fourth interim fee application; review of Budgets and staffing; update exhibit; review of invoices send for payment; update application.	0.80	195.00	156.00
<b>Subtotal: B160 / Fee/Employment Applications</b>			4.70		\$947.50

PROMESA - Official Committee of Unsecured Creditors  
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**B161 / Budgeting**

10/02/20	JA	Revise Fee Statements to conform with Fee Examiner guidelines.	0.70	575.00	402.50
10/06/20	JA	Review and finalize Fee Statements in conformity with Fee Examiner standards.	0.40	575.00	230.00
10/12/20	JA	Prepare November budget for Committee consideration.	0.80	575.00	460.00
<b>Subtotal: B161 / Budgeting</b>			1.90		\$1,092.50

**B191 / General Litigation**

10/01/20	JHG	Review email from Alex Bongartz and attached proposed debt negotiation.	0.60	765.00	459.00
10/01/20	JHG	Review email from Alex Bongartz regarding motion for emergency consideration regarding GO Bond and exchange of offers.	0.60	765.00	459.00
10/01/20	JA	Review Fiscal Plan Economic Overview and PSA Creditor Proposal (.9); strategize regarding impact on disclosures and bond trading (.7).	1.60	575.00	920.00
10/02/20	JHG	Review draft motion by UCC for reconsideration of lift stay order and analysis of issues.	1.10	765.00	841.50
10/03/20	JA	Review additional 2019 disclosure information and analyze with respect to current fiscal disclosure by FOMB, including charting of same for visual analysis.	3.70	575.00	2,127.50
10/05/20	JHG	Review research regarding fiduciary duties of committee regarding investigation in support of litigation objectives and provide direction to litigation team.	1.20	765.00	918.00
10/05/20	JHG	Review Promesa statute regarding incorporated provisions.	0.80	765.00	612.00
10/05/20	JHG	Review policies and procedures of United States Trustee relating to request by National.	0.40	765.00	306.00
10/05/20	JHG	Review ECF 14452, order denying UCC reconsideration regarding lift stay.	0.20	765.00	153.00
10/05/20	JHG	Continued review of ECF 14450, National motion for investigation.	2.30	765.00	1,759.50
10/05/20	JA	Confer with co-counsel regarding inquiry from National (.1); research and strategize National position as to UCC (.4); review National Motion for Investigation (1.1); legal research and analysis regarding National Motion (.6); strategize regarding National Motion relating to current Committee analysis (1.2); confer with National counsel (.1); review Order Denying GO Bond Priority(.1)	3.60	575.00	2,070.00
10/05/20	JMS	Revise bond trading analysis (1.5); research and issues raised by Committee (1.9)	3.40	500.00	1,700.00

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10/06/20	JHG	Review ECF 14465, statement of position regarding AAFAF regarding motion to strike.	0.40	765.00	306.00
10/06/20	JA	Continued analysis of National Motion to Investigate (.6); strategize with M. Friedman regarding relief requested (.3); compare analytical base of National Motion to internal analysis performed (.6); legal research and analysis regarding relief requested (.6); consider limited joinder (.2); review draft Certificate of No Objection regarding Motion to Clarify Deadlines (.1); review objection of FOMB to AMBAC Motion to Strike Amended PSA (.6); review Joint Motion of PSA Creditors to Impose Deadlines (.8); strategize as to 2019 Disclosure issues and Requested Investigation (.8)	4.60	575.00	2,645.00
10/06/20	JMS	Research issues arising from National Motion for Independent Investigation (2.8) and prepare draft joinder (1.4)	4.20	500.00	2,100.00
10/07/20	JHG	Review and analysis regarding GO Bondholders motion to impose deadlines regarding plan of adjustment.	1.20	765.00	918.00
10/07/20	JHG	Review ECF 14460, objection of Financial Oversight and Management Board to AMBAC motion to strike.	1.10	765.00	841.50
10/07/20	JA	Review PSA Creditors' Motion to Impose Deadlines (.6); review correspondence from SCC regarding Default Motions (.2); strategize regarding call with National counsel (.4)	1.20	575.00	690.00
10/07/20	JMS	Continued research issues arising from National Motion for Independent Investigation relating to proposed joinder by committee.	1.70	500.00	850.00
10/07/20	JZ	Receipt and review of Order Granting the Oversight Board, SCC, and UCC's Motion to Clarify Litigation Deadlines in the Vendor Action adversary cases [ECF NO. 14489]; receipt and review of said order filed in adversary nos. 19-276, 19-277 and 19-279; review calendaring of deadlines; update electronic case profile.	0.40	195.00	78.00
10/08/20	JHG	Review first administrative claims resolution.	0.60	765.00	459.00
10/08/20	JA	Confer with counsel for National (.8); strategize with J. Casillas (.2); strategize regarding potential joinder and litigation plan (.8)	1.80	575.00	1,035.00
10/09/20	JHG	Continued review of bond trading analysis memorandum.	0.80	765.00	612.00
10/09/20	JA	Confer and strategize with J. Casillas regarding National Joinder (.2); Confer with A. Velazquez (.2); Confer with Susheel Kirpilani regarding UCC position (.2); Confer with Gary Lee regarding UCC position (.2); Strategize regarding potential strategy relating to National motion for investigation and Bondholder groups (.8)	1.60	575.00	920.00
10/09/20	JMS	Research in support of and begin drafting Motion for Rule 2004 Examination concerning 2019 disclosures.	2.70	500.00	1,350.00

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10/10/20	JA	Confer with Kurt Mayr regarding UCC and National (.2); strategize with A. Velasquez (.2); revise and finalize Joinder (1.2); review Supplemental Response to UCC regarding Status Report (.2)	1.80	575.00	1,035.00
10/10/20	JMS	Research in support of and continued drafting of Rule 2004 Motion concerning bond trading.	2.60	500.00	1,300.00
10/10/20	JZ	Revise, finalize and file UCC's Limited Joinder in Response to the Motion of National Public Finance Corporation for Entry of an Order Directing Independent Investigation; circulate same; update electronic case profile.	0.60	195.00	117.00
10/12/20	JHG	Review draft UCC objection to joint motion regarding deadlines and provide direction to litigation team.	0.90	765.00	688.50
10/12/20	JMS	Continued research and drafting in support of 2004 discovery (1.7); research relating to issues to joinder investigation motion in support of Committee requests (1.5)	3.20	500.00	1,600.00
10/13/20	JHG	Review and analysis of response to National motion by FOMB and provide analysis to litigation team.	0.90	765.00	688.50
10/13/20	JHG	Review and analysis of email from J. Arrastia, review redacted objection of LCDC to National motion (.8); and provide direction to litigation team (.3)	1.10	765.00	841.50
10/13/20	JHG	Review Ad Hoc Group objection (ECF 14562) to National motion and provide direction to litigation team.	0.80	765.00	612.00
10/13/20	JHG	Review Ad Hoc objection (ECF 14556) to National motion and provide direction to litigation team.	0.60	765.00	459.00
10/13/20	JHG	Review QCTB objection to National motion.	0.80	765.00	612.00
10/13/20	JHG	Review Sculptor response to National motion (ECF 14554) and provide analysis and direction to litigation team.	0.70	765.00	535.50
10/13/20	JA	Review Objections to National Motion from LCDC, QCTB, ADHOC GO, Sculptor and FOMB (3.1); confer with A. Velasquez (.2); review Objection to Motion to Impose Deadlines [ECF 14547] (.8); AMBAC Objection to Motion [ECF 14559] (.3); review AAFAF Objection (.7); review communication strategy (.2)	5.30	575.00	3,047.50
10/13/20	JMS	Continued research into scope of proposal (2.0); and continued revisions to 2004 discovery and related issues to joint investigation motion (1.2)	3.20	500.00	1,600.00
10/14/20	JHG	Review and analysis of updated UCC draft plan deadline motion, provide comments regarding same,	1.40	765.00	1,071.00
10/14/20	JHG	Review redlined comparison regarding draft.	0.20	765.00	153.00

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10/14/20	JA	Review ADHOC Constitutional Debt Holders Response to National's Motion (.3); request unredacted version of LCDDC Objection from counsel (.2); review unredacted objection by LCDDC (.6); confer with counsel for LCDDC regarding redactions (.1); review issues regarding federal mediation privilege (.3); analyze specific trading activity relating to objections (.8)	2.30	575.00	1,322.50
10/14/20	JZ	Receipt and review of UCC's Objection to the Joint Motion of PSA Creditors to Impose Deadlines for Plan of Adjustment [ECF NO. 14576]; circulate same; update electronic case profile.	0.30	195.00	58.50
10/15/20	JHG	Review UCC letter to Proskauer regarding Peterson appointment.	0.20	765.00	153.00
10/15/20	JHG	Review First Circuit regarding PTA motion to dismiss or abate appeal.	1.20	765.00	918.00
10/15/20	JA	Review correspondence regarding Motions for Default from SCC counsel (.2); review Order on LCDDC Motion to Seal (.2); confer with LCDDC counsel regarding redactions of Objection (.3); legal research regarding Mediation Privilege (.4); correspondence from opposing counsel regarding Mediation Privilege (.1); review unredacted Objection (.4)	1.60	575.00	920.00
10/15/20	JMS	Research and analysis of issues raised by UCC concerning Motion for Rule 2004 discovery on bond trading (2.7), prepare draft discovery (3.1)	5.80	500.00	2,900.00
10/16/20	JHG	Review emails and conference with J. Arrastia regarding 2004 examinations.	0.80	765.00	612.00
10/16/20	JHG	Review provisions of case management order concerning emergency drafting of motions.	0.30	765.00	229.50
10/16/20	JHG	Review ECF 14590, appeal on Priority Bond objection.	0.40	765.00	306.00
10/16/20	JHG	Review email from Alex Bongartz concerning litigation matters.	0.50	765.00	382.50
10/16/20	JA	Prepare Motion for 2004 Discovery (.8); confer with all opposing counsel (.5); email to all opposing counsel (.3); legal research and analysis (.8); revise draft motion (.8); prepare Motion to Expedite (.8); confer with client (.3); confer with opposing counsel (.4); finalize draft motion and Motion to Expedite (.7); confer with J. Genovese (.8)	6.20	575.00	3,565.00
10/16/20	JMS	Finalize draft Motion for Rule 2004 discovery and finalize for filing re Bondholder trading (2.6); research and draft motion to expedite (2.2);	4.80	500.00	2,400.00
10/16/20	JZ	Conference with J. Arrastia regarding discovery; Format, finalize and file Urgent Motion for Expedited Consideration of UCC's Urgent Motion for Order, Under Bankruptcy Rule 2004, Authorizing Discovery Concerning Bond Trading [ECF No. 14601]; update electronic case profile.	0.60	195.00	117.00

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10/17/20	JZ	Format, finalize and file Urgent Motion for Expedited Consideration of UCC's Urgent Motion for Order, Under Bankruptcy Rule 2004, Authorizing Discovery Concerning Bond Trading [ECF No. 14603]; draft e-mail to Judge Swain attaching same; update electronic case profile.	0.60	195.00	117.00
10/18/20	JA	Review correspondence from mediation team and strategize (.3); consider Response to LCDC Motion to Seal (.2); legal research and analysis regarding sealing and mediation privilege (.7); prepare response (.6); confer with client (.3); strategize regarding Reply to National Motion and Joinder (.4)	2.50	575.00	1,437.50
10/19/20	JHG	Review litigation strategy recommendations to committee members.	0.30	765.00	229.50
10/19/20	JHG	Review and consideration of order denying urgent motion.	0.30	765.00	229.50
10/19/20	JHG	Review and analysis of ECF 14604, and strategy of bondholder response.	1.10	765.00	841.50
10/19/20	JHG	Review Court orders (ECF 14605, ECF 14613).	0.40	765.00	306.00
10/19/20	JHG	Review and analyze daily summary prepared by J. Delgado to identify and analyze strategic litigation issues.	0.40	765.00	306.00
10/19/20	JA	Analyze Bondholder Opposition to Motion to Expedite Consideration of 2004 Discovery (.8); strategize and prepare expedited Reply to Opposition (3.4); review court Order and analyze same (.4); review reference (.1)	4.70	575.00	2,702.50
10/19/20	AMC	Review, analyze, and investigate positions of all pertinent parties--including objections--with respect to National's motion for independent investigation (ECF 14450) and cross-reference various orders / filings in the PROMESA case referenced in said papers	3.60	375.00	1,350.00
10/20/20	JHG	Review joint presentation stipulation concerning mediation.	0.40	765.00	306.00
10/20/20	JHG	Review emails from Hindman regarding mediation team analysis.	0.30	765.00	229.50
10/20/20	JHG	Review ECF 14666 omnibus reply regarding plan deadlines.	0.80	765.00	612.00
10/20/20	AMC	Review of Statement of Certain ERS Bondholders Regarding the Joint Motion of PSA Creditors Pursuant to Section 312 of PROMESA and Section 105 of the Bankruptcy Code to Impose Deadlines for Plan of Adjustment, and Joint Motion of PSA Creditors Pursuant To Section 312 of PROMESA and Section 105 of the Bankruptcy Code to Impose Deadlines For Plan of Adjustment	0.60	375.00	225.00
10/20/20	AMC	Review, summarize, and attend to internal communications concerning Court's order establishing procedures re: upcoming omnibus hearing	0.30	375.00	112.50



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10/21/20	JHG	Review and analysis of National reply memorandum regarding independent investigation.	1.30	765.00	994.50
10/21/20	JHG	Review National Resources committee letter and strategy.	0.80	765.00	612.00
10/21/20	JHG	Review and analysis of daily summary from J. Delgado to identify and analyze litigation issues.	0.40	765.00	306.00
10/21/20	JHG	Review ECF 14748, UCC limited response to National motion.	0.50	765.00	382.50
10/21/20	JHG	Review ECF 14755, response and limited objection by National.	0.60	765.00	459.00
10/21/20	JHG	Review ECF 14752, UCC reply regarding National and provide litigation strategy to J. Arrastia.	0.40	765.00	306.00
10/21/20	JA	Review Reply in Further Support of National Investigative Motion (1.1); review Response of Mediation Team [DE 14735] (.2); review correspondence from Congress to FOMB (.3); finalize Reply to LCDC Motion to Unseal (.1); prepare Reply to National Motion (.3); confer with National counsel regarding Joint Motion (.2); review and examine National Reply against internal research and analysis for confirmity (1.2); strategize regarding Congressman's correspondence to FOMB and impact on pending motions (.6)	4.00	575.00	2,300.00
10/21/20	AMC	Additional research concerning principles of standing, prudential standing, and the continuing viability of the Wagonner Rule	2.30	375.00	862.50
10/21/20	JZ	Format, finalize and file Response and Limited Objection Of Official Committee Of Unsecured Creditors To The Urgent Motion Of The Lawful Constitutional Debt Coalition To File Under Seal Certain Portions Of Its Objection To The Motion Of National Public Finance Guarantee Corporation For Entry Of An Order Directing An Independent Investigation; update electronic case profile.	0.60	195.00	117.00
10/22/20	JA	Analyze issues for oral argument regarding National Investigation Motion (.3); email to counsel for National regarding argument (.1); review draft agenda for hearing relating to National Motion (.2); confer with National regarding pending motions (1.1); review motions of Bondholders (.2); review draft informative motion (.1); review Order on LCDC Motion (.1); review revised Joint Informative Motion (.1)	2.20	575.00	1,265.00
10/22/20	JZ	Receipt and review of Order Regarding Reply Memorandum in Further Support of National's Independent Investigation Motion [ECF No 14764]; calendar deadline; update electronic case profile.	0.20	195.00	39.00
10/22/20	JZ	Draft Informative Motion advising the Court for J. Arrastia's intention to participate in the October 28th omnibus hearing; e-mail same to J. Arrastia for review.	0.60	195.00	117.00
10/23/20	JHG	Review ECF 14787, informative motion of LCDC regarding October 28-29, 2020 hearing.	0.30	765.00	229.50



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10/23/20	JHG	Review informative motion of FOMB (ECF 14793).	0.20	765.00	153.00
10/23/20	JA	Review Order requesting statement from mediation team (.1); review Supplemental Reply (.2); review correspondence of Jennifer Gonzales to SEC and strategize (.4)	0.70	575.00	402.50
10/23/20	JMS	Provide research and analysis concerning joint motion for investigation and committee joinder.	2.60	500.00	1,300.00
10/23/20	AMC	Review of draft agenda in respect of upcoming omnibus hearing and assist with preparation for argument at the same	1.20	375.00	450.00
10/23/20	AMC	Draft / create supplemental data analysis concerning bondholders comprising the various ad hoc groups, with particular emphasis on those creditors who have filed papers in advance of the Court's upcoming omnibus hearing	1.40	375.00	525.00
10/25/20	JA	Review Court Order [DE 14918] (.1)	0.10	575.00	57.50
10/26/20	JHG	Review ECF 14923, status report and provide analysis to litigation team.	0.60	765.00	459.00
10/26/20	JA	Review FOMB status report (.2); review National Supplemental Reply (.2); strategize regarding National Investigation Argument (.6); review Notice of Agenda (.1); review Reply to Response to LCDC (.3); review Sculptor Demonstrative (.2)	1.60	575.00	920.00
10/26/20	JMS	Research issues relating to the Joint Motion for and Investigation (1.9) and provide analysis to J. Arrastia (.5)	2.40	500.00	1,200.00
10/27/20	JHG	Review issues regarding Petersen appointment.	0.80	765.00	612.00
10/27/20	JHG	Review issues of pension laws and payroll cuts.	0.30	765.00	229.50
10/27/20	JA	Strategize with Scott Martinez regarding financial aspects of PSA (.4); REview Order Denying Motion of LCDC to File Under Seal (.1); Review Amended Demonstrative of Sculptor (.1); Review Fiscal Board's Status Report (.2); Prepare oral argument on behalf of UCC as it relates to Committee's Joinder (1.3); confer and strategize with J. Suarez (.6)	2.70	575.00	1,552.50
10/27/20	JMS	Research issues relate to the Motion for an Investigation and Committee Joinder and provide analysis to J. Arrastia.	2.80	500.00	1,400.00
10/27/20	AMC	Assist with preparation for October 28 Omnibus hearing, and attend to additional research of federal and federal bankruptcy authorities relating to the Committee's argument(s) concerning insider trading.	2.70	375.00	1,012.50
10/28/20	JMS	Review court's ruling on Joint Motion for Investigation and review appellate options.	1.60	500.00	800.00
10/28/20	AMC	Attend telephonically Omnibus hearing as it relates to National's Motion for Independent Investigation and the Committee's Joinder thereto.	1.70	375.00	637.50

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10/28/20	AMC	Review / analyze court's written Order Denying National's Motion regarding independent investigation.	0.20	375.00	75.00
10/29/20	JZ	Receipt and review of Order on the Joint Motion of the PSA Creditors Pursuant to Section 312 of PROMESA and Section 105 of the Bankruptcy Code to Impose Deadlines for a Plan of Adjustment [ECF No. 14987]; calendar deadline contained in order; update electronic case profile.	0.30	195.00	58.50
10/30/20	JA	Review Order on the Joint Motion of the PSA Creditors Pursuant to Section 312 of PROMESA and Section 105 of the Bankruptcy Code to Impose Deadlines for a Plan of Adjustment (.2)	0.00	575.00	0.00
10/30/20	AMC	Review of Order on the Joint Motion of the PSA Creditors Pursuant to Section 312 of PROMESA and Section 105 of the Bankruptcy Code to Impose Deadlines for a Plan of Adjustment	0.30	375.00	112.50
<b>Subtotal: B191 / General Litigation</b>			145.60		\$82,326.00
<b>Total</b>			<b>210.20</b>		<b>\$104,209.00</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	33.40	765.00	25,551.00
JMS	Jesus M Suarez	Partner	41.00	500.00	20,500.00
MGG	Mariaelena Gayo-Guitian	Partner	0.20	575.00	115.00
JA	John Arrastia	Partner	66.70	575.00	38,352.50
JAD	Joyce A Delgado	Associate	29.40	315.00	9,261.00
AMC	Angelo M Castaldi	Associate	15.40	375.00	5,775.00
CE	Carolyn Esser	Paralegal	1.00	150.00	150.00
CBH	Colleen B Hopkins	Paralegal	3.50	195.00	682.50
JZ	Johana Zamora	Paralegal	19.60	195.00	3,822.00
<b>Total</b>			<b>210.20</b>		<b>\$104,209.00</b>

**Costs and incurrent and advanced**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/31/2020	Data management and hosting (12272-001) Trustpoint.One 20-10386	7,331.55

**Total Costs incurrent and advanced** **\$7,331.55**

**Current Fees and Costs** **\$111,540.55**

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 23, 2020  
Please Refer to  
Invoice Number: 100021

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

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**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Oct 31, 2020	29,852.50
Costs incurred and advanced	
<b>Current Fees and Costs Due</b>	<b>29,852.50</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

**TO PROTECT AGAINST FRAUD**, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ [kforrest@gjb-law.com](mailto:kforrest@gjb-law.com) and requesting written and verbal confirmation.

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ [kforrest@gjb-law.com](mailto:kforrest@gjb-law.com)

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 23, 2020

Please Refer to

Invoice Number: 100021

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

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FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Oct 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
10/09/20	JZ	Receipt and review of Government Parties Supplemental Response to the UCC's Supplemental Brief Regarding Status Report [ECF No. 2241]; circulate same; update electronic case profile.	0.30	195.00	58.50
10/16/20	JZ	Receipt and review of PREPA's Motion requesting extension of time to answer Complaint [ECF No. 10] (.2); receipt and review of Order Granting Same [ECF No. 12]; calendar new deadline (.2); receipt of Order referring case to General Magistrate [ECF No. 11]; circulate filing (.1); update electronic case profile (.1)	0.60	195.00	117.00
10/20/20	JZ	Receipt and review Judge's Order regarding Procedures at the 10.29 omnibus hearings; calendar deadlines contained in Order; schedule telephonic appearance for J. Arrastia via Courtcall.	0.40	195.00	78.00
10/21/20	AMC	Supplemental review / due diligence of materials submitted in PREPA - Vitol litigation, including issues relating to summary judgment and remand, and the development of Vitol's arguments as compared against arguments in prior litigation	1.60	375.00	600.00
<b>Subtotal: B110 / Case Administration</b>			2.90		\$853.50
<b>B150 / Meetings of Creditors</b>					
10/05/20	JA	Prepare update to Committee regarding litigation status.	0.70	575.00	402.50
10/07/20	JA	Email correspondence to Committee.	0.20	575.00	115.00
<b>Subtotal: B150 / Meetings of Creditors</b>			0.90		\$517.50
<b>B191 / General Litigation</b>					

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10/01/20	JSR	Read analys of fuel oil litigation, pending class action litigation, and potential additional claims of the committee, and researched intervening case law since the preparation of the initial memorandum.	2.90	305.00	884.50
10/02/20	JMS	Direct legal research concerning standing and litigation against class action plaintiffs (1.3); attention to prosecution of claim against fuel oil defendants (1.1)	2.40	500.00	1,200.00
10/02/20	JA	Review draft Supplemental Brief regarding Motion to Terminate PREPA 9019 (.2); review draft Motion to Dismiss for Default, draft Declaration, and other materials in support (.6)	0.80	575.00	460.00
10/02/20	JSR	Continued research on intervening caselaw and writing case summaries on in pari delicto.	2.10	305.00	640.50
10/05/20	JA	Prepare for conference call with Proskauer and Brown Rudnick regarding litigation strategy (1.1); conduct conference call regarding litigation strategy with counsel for Brown Rudnick and Proskauer (1.0); strategize following call (.6); research case file regarding communications and agreements with SEC regarding Fuel Oil Claim (.6)	3.30	575.00	1,897.50
10/05/20	JZ	Conference with A. Castaldi regarding the summons in the Marrero Plaintiff Adversary 20-115; review of docket; e-mail to A. Castaldi with findings.	0.20	195.00	39.00
10/06/20	JHG	Review issues regarding Marrero parties intervention and proposal; provide direction to litigation team.	1.10	765.00	841.50
10/06/20	JA	Strategize regarding litigation plan (.6); research and strategize case issues (.4); review settlement offer from Marrero Plaintiffs (.4); email to Ed Weisfelner (.1); confer with Juan Casillas and A. Velazquez (.1); strategize with M. Friedman (.5)	2.10	575.00	1,207.50
10/06/20	MAF	Conference with J Arrastia regarding standing in committee to seek declaratory judgment, various theories and circumstances implicated (.5)	0.50	550.00	275.00
10/07/20	JHG	Review and analysis of email regarding Marrero settlement proposal; provide input to J. Arrastia.	1.00	765.00	765.00
10/07/20	JA	Review Motion for PREPA for Order Approving Settlement Agreements (.2); revise and finalize briefing submission (.1); review legal research regarding assertion of declaratory judgment action and injunction as counterclaim (.3); strategize regarding options to pursue fuel oil claims (.8)	1.40	575.00	805.00
10/07/20	JA	Confer with Ed Weisfelner regarding proposal for settlement (.2); confer with Ed Weisfelner regarding Marrero claims (.1)	0.30	575.00	172.50
10/07/20	JSR	Continued in pari delicto research as applied to issues raised by SCC.	1.10	305.00	335.50
10/07/20	JSR	Legal research and analysis regarding injunction, declaratory judgment, and counterclaim implicated in Adversary proceedings.	1.10	305.00	335.50

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10/08/20	JA	Receive email from opposing counsel (.1); review docket status of pending adversaries (.2); prepare Notice of Voluntary Dismissal (.1); prepare Notice of Appearance (.1); strategize regarding filing of counterclaim (.9); prepare draft answer and counterclaim (.8); confer with J. Zamora regarding filings in AP 115 (.2)	2.40	575.00	1,380.00
10/08/20	JMS	Research issues in support of dismissal of AP 114 and assertion of counterclaim in -115 (2,3), draft related documents (1.7)	4.00	500.00	2,000.00
10/08/20	JZ	Conference with J. Arrastia regarding Marrero Plaintiff's adversary 20-115; draft outline of court filings and deadlines; e-mail supporting filings to J. Arrastia for review.	0.60	195.00	117.00
10/09/20	JA	Revise and finalize Voluntary Dismissal of AP 114 (.1); revise and finalize Answer and Counterclaim (1.8); confer with opposing counsel (multiple emails) (.2); strategize with Jesus Suarez (.6); confer with J. Zamora regarding filing (.2)	2.90	575.00	1,667.50
10/09/20	JMS	Work on Answer, Counterclaim in -115 AP re Marrero Plaintiffs.	2.20	500.00	1,100.00
10/09/20	JZ	Conference with J. Arrastia regarding strategy in the Marrero Plaintiff adversary cases (20-114 and 20-115) (.2); Revise UCC's Answer and counterclaim, retrieve and resize exhibits thereto, finalize and file same; calendar deadline for Plaintiffs' response to counterclaim in ADV. 20-115 (.5); revise, finalize and file Notice of Dismissal in ADV. 20-114 (.2); circulate same (.1); update electronic case profile (.2)	1.20	195.00	234.00
10/09/20	JZ	Finalize and file Notices of Appearance in ADV. 20-115 for J. Arrastia [ECF No. 8] and Jesus Suarez [ECF No. 9]; update electronic case profile.	0.40	195.00	78.00
10/16/20	JHG	Review (ECF 14586) order regarding UCC motion to terminate 9019 motion in support of litigation matters.	0.40	765.00	306.00
10/16/20	JA	Analyze correspondence from FOMB (.4); strategize regarding response (.6); review case file (.4); initial responsive correspondence (.8)	2.20	575.00	1,265.00
10/19/20	AMC	Review of Judge Dein's order concerning Rule 2004 discovery, and attend to internal communications concerning the same	0.30	375.00	112.50
10/20/20	JHG	Review and analyze draft letter to Proskauer regarding Marrero issues and FOMB position.	1.20	765.00	918.00
10/20/20	JA	Analyze correspondence from FOMB regarding Fuel Oil Counterclaim (.6); prepare and revise draft correspondence (2.1); strategize (.4)	3.10	575.00	1,782.50
10/21/20	JHG	Review litigation strategy memorandum regarding fuel oil litigation and review and strategize regarding same.	1.20	765.00	918.00
10/21/20	JA	Prepare and revise correspondence to Proskauer regarding Fuel Oil litigation and AP 115 (.6); review and analyze Stipulation and case history (.6); revise correspondence (.4)	1.60	575.00	920.00

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10/22/20	JA	Strategize regarding AP 115 and claims of co-plaintiff as to Answer and Counterclaims and next steps.	1.10	575.00	632.50
10/22/20	JMS	Review and comment on response to FOMB letter concerning Catsby Jones Litigation.	1.30	500.00	650.00
10/23/20	JA	Revise and finalize correspondence to Proskauer regarding AP 115 (.6); strategize regarding litigation issues relating to AP 115 and AP 388 (.8); review Order on 9019 Motion (.2)	1.60	575.00	920.00
10/26/20	JA	Review Amended Complaint (.6); strategize regarding response (1.2)	1.80	575.00	1,035.00
10/27/20	AMC	Review and analyze Rule 15 regarding amendments as matter of right, and review of Committee notes concerning the same.	0.40	375.00	150.00
10/27/20	AMC	Detailed review and analysis of amended complaint filed in Adv. Case No. 20-115.	1.30	375.00	487.50
10/27/20	AMC	Research concerning effect of amendment on previously filed counterclaim, and effect of dropping party with previously filed counterclaim.	2.10	375.00	787.50
10/27/20	JZ	Receipt and review of Amended Complaint in the Marrero Plaintiff ADV 20-115; circulate same; review of Federal Rules to determine deadline to file response; calendar compliance deadline; update electronic case profile.	0.70	195.00	136.50
10/28/20	AMC	Preliminary review of letter from counsel for FOMB dated 10/27.	0.20	375.00	75.00
10/29/20	JMS	Review and research issues regarding proposed intervention in Catsby Jones case	1.90	500.00	950.00
10/30/20	JA	Review Motion for Enlargement and Order (.1)	0.00	575.00	0.00
<b>Subtotal: B191 / General Litigation</b>			56.40		\$28,481.50
<b>Total</b>			<b>60.20</b>		<b>\$29,852.50</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	4.90	765.00	3,748.50
JMS	Jesus M Suarez	Partner	11.80	500.00	5,900.00
MAF	Michael A Friedman	Partner	0.50	550.00	275.00
JA	John Arrastia	Partner	25.50	575.00	14,662.50
JSR	Jeremy S Rosner	Associate	7.20	305.00	2,196.00
AMC	Angelo M Castaldi	Associate	5.90	375.00	2,212.50
JZ	Johana Zamora	Paralegal	4.40	195.00	858.00
<b>Total</b>			<b>60.20</b>		<b>\$29,852.50</b>

**Current Fees and Costs**

**\$29,852.50**

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 23, 2020  
Please Refer to  
Invoice Number: 100022

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the  
~~Government - Commonwealth of Puerto Rico~~

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**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-003

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government  
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services  
for the period ending Oct 31, 2020

6,339.00

Costs incurred and advanced

**Current Fees and Costs Due**

6,339.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.***

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com



**Genovese Joblove & Battista, P.A.**

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Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 23, 2020

Please Refer to

Invoice Number: 100022

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the  
~~Government Commonwealth of Puerto Rico~~

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FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Oct 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
10/28/20	JZ	Receipt and review of Committees' Motion to Strike the Declaration of John Faith and Accompanying Exhibit From the BONY's Motion for Summary Judgment [ECF No. 1000]; circulate same; update electronic case profile.	0.30	195.00	58.50
10/28/20	JZ	Receipt and review of Bank of NY Mellon as Fiscal Agent's Response to the Committees' Motion for Summary Judgment [ECF No. 998] and Response and Additional Facts to the Committees' Statement of Undisputed Material Facts in Support of the Motion for Summary Judgment on Ultra Vires Issues [ECF No. 999]; circulate same; update electronic case profile.	0.50	195.00	97.50
10/29/20	JZ	(ADV. 19-00367) Receipt and review of ERS' Opposition to Defendants' Motion for Partial Summary Judgment on Lien Scope Issues [ECF No. 124] (.2); Defendants' Brief in Opposition to Plaintiffs' Motion for Partial Summary Judgment on Lien Scope Issues [ECF No. 126] (.2); Defendants' Response to Statement of Material Undisputed Facts of the ERS in Support of Rule 7056 Motion for Summary Judgment [ECF No. 127] and Defendants' Evidentiary Objections to the Declaration of Cecile Tirado Soto in Respect of ERS' Rule 7056 Motion for Summary Judgment [ECF No. 128] (.2); circulate filings (.1); update electronic case profile (.2).	0.70	195.00	136.50
10/29/20	JZ	Review of ERS Bondholders' Response to the Committees' Statement of Undisputed Material Facts in Support of Motion for Summary Judgment on Ultra Vires Issues (.2); Bondholders' Brief in Opposition to the Committees' Motion for Summary Judgment on Ultra Vires Issues and Declaration of S. Sooknanan In Support Of ERS Bondholders Brief In Opposition To The Committees Motion For Summary Judgment filed in ADV. 19-00356, 19-00357, 19-00359 and 19-00361 (.4); circulate same (.1); update electronic case profile (.2)	0.80	195.00	156.00

PROMESA - Official Committee of Unsecured Creditors  
12272-003  
Invoice No. 100022

Page 2

10/30/20	JZ	Review case management order for service procedures in Adversary Cases; obtain service information for parties required to be served via e-mail and U.S. Mail including COFINA's top 20 creditors (.8); draft Certificate of Service including Exhibit A for parties served via CM/ECF, Exhibit B for parties served via E-mail and Exhibit C for parties served via U.S. Mail for ADV. 19-356, 19-57, 19-359 and 19-361 (.6); finalize and file Certificates of Service (.2); create sharefile links for documents being served in each adversary matter (.3); effectuate service via method listed on the Certificate of Service (.3)	2.00	195.00	390.00
<b>Subtotal: B110 / Case Administration</b>			4.30		\$838.50
<b>B191 / General Litigation</b>					
10/27/20	JA	Review draft Response to Bond Holders and Fiscal Agents Motions for Summary Judgment on Ultra Vires Issues (1.4); Review Response to BONY Statement of Material Undisputed Facts (.9); Review Response to Bondholders' Statement of Material Undisputed Facts (.6); Review Motion to Strike (.4); Review Gonzalez Disqualification Motion (.6)	3.90	575.00	2,242.50
10/28/20	JA	Review Motion in Response to Additional Facts of BONY (.4); Attention to finalizing and filing ERS Summary Judgment materials (.2); Response of BONY Response to UCC Motion for Summary Judgment (.6);	1.20	575.00	690.00
10/28/20	JZ	Finalize and file Motion to Exclude Expert Testimony of Dr. Laura Gonzalez; Committee's Response to ERS Bondholders Rule 56(b) Statement of Undisputed Facts in Support of Motion for Partial Summary Judgment; Committee's Response to Motion for Summary Judgment and Declaration of Landon S. Raiford in Support of Committee's response with numerous exhibits in ERS adversary cases 19-356, 19-357, 19-359, 19-361 (2.0); update electronic case profiles (.4)	2.40	195.00	468.00
10/29/20	AMC	In respect of multiple adversary proceedings in which Committee acts as co-trustee and co-plaintiff, review, analysis and summary of (A) Defendants' Brief in Opposition to Plaintiffs' Motion for Partial Summary Judgment on Lien Scope Issues, and the Defendants' Response to Statement of Material Undisputed Facts of the ERS in Support of Rule 7056 Motion for Summary Judgment, and (B) Committees' Response to ERS Bondholders Rule 56(B) Statement of Undisputed Facts in Support of Motion for Partial Summary Judgment on Ultra Vires Issues and Proceedings and Committees' Response to the Statement of Undisputed Material Facts in Support of the Motion of the Bank of New York Mellon as Fiscal Agent for Summary Judgment Pursuant to Rule 56 Regarding Ultra Vires Challenge	3.80	375.00	1,425.00
10/30/20	AMC	Review and summarize Committees' Response to (i) ERS Bondholders' Motion for Partial Summary Judgment on Ultra Vires Issues and Proceedings; and (ii) BONY's Motion for Summary Judgment Pursuant to Rule 56 Regarding Ultra Vires Challenge.	1.80	375.00	675.00

PROMESA - Official Committee of Unsecured Creditors  
12272-003  
Invoice No. 100022

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Subtotal: B191 / General Litigation	13.10	\$5,500.50
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Total	17.40	\$6,339.00
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**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JA	John Arrastia	Partner	5.10	575.00	2,932.50
AMC	Angelo M Castaldi	Associate	5.60	375.00	2,100.00
JZ	Johana Zamora	Paralegal	6.70	195.00	1,306.50
Total			17.40		\$6,339.00

**Current Fees and Costs**

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**\$6,339.00**

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

January 14, 2021  
Please Refer to  
Invoice Number: 100101

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

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**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-001  
PROMESA - Official Committee of Unsecured Creditors  
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Nov 30, 2020	37,604.00
Costs incurred and advanced	<u>7,308.84</u>
<b>Current Fees and Costs Due</b>	<b>44,912.84</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.***

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

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Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

January 14, 2021

Please Refer to

Invoice Number: 100101

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Nov 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
11/02/20	JNS	Attention to email from Joyce Delgado regarding recent filed documents and deadlines.	0.20	75.00	15.00
11/02/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.40	195.00	78.00
11/03/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.50	195.00	97.50
11/04/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.50	195.00	97.50
11/05/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.30	195.00	58.50
11/06/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.30	195.00	58.50
11/09/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.30	195.00	58.50
11/10/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.30	195.00	58.50
11/11/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.40	195.00	78.00
11/12/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.40	195.00	78.00

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
Invoice No. 100101

Page 2

11/12/20	JZ	Receipt and review of Order Regarding Procedures for November 18th hearing [ECF No. 15097]; circulate same; update electronic case profile.	0.30	195.00	58.50
11/13/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.30	195.00	58.50
11/16/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.40	195.00	78.00
11/17/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.30	195.00	58.50
11/18/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.40	195.00	78.00
11/18/20	JZ	Receipt and review of Notice of Agenda of Matters Scheduled for November 20th; circulate same; update electronic case profile.	0.30	195.00	58.50
11/19/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.30	195.00	58.50
11/20/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.50	195.00	97.50
11/20/20	JZ	Attention to Ambac's Motion for an Order Directing Cash Rule 2004 Discovery From the FOMB and related filings thereto; update electronic case profile.	0.30	195.00	58.50
11/23/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.40	195.00	78.00
11/24/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.30	195.00	58.50
11/30/20	JZ	Review daily summary of relevant filings prepared by J. Delgado, calendar deadlines, manage scheduling, and address orders for attorney attention.	0.40	195.00	78.00
<b>Subtotal: B110 / Case Administration</b>			7.80		\$1,497.00
<b>B113 / Pleadings Review</b>					
11/01/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for October 31 through November 1, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.90	315.00	283.50

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
Invoice No. 100101

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11/02/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 2, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.90	315.00	283.50
11/03/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 3, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.80	315.00	252.00
11/04/20	JAD	Conference call with counsel for Creditors' Committee to discuss status of proceedings, pertinent litigation issues, pending motions, and budget (.5); review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 4, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (1.1)	1.60	315.00	504.00
11/05/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 5, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.50	315.00	472.50
11/06/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 6, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.30	315.00	409.50
11/09/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 7 through November 9, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.80	315.00	252.00
11/10/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 10, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.90	315.00	598.50
11/11/20	JAD	Conference call with counsel for Creditors' Committee to discuss status of proceedings, pertinent litigation issues, pending motions, and budget (.3); review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 11, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (.9)	1.20	315.00	378.00

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
Invoice No. 100101

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11/12/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for September 23, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.30	315.00	724.50
11/13/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 13, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.60	315.00	504.00
11/16/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 14 through November 16, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.20	315.00	693.00
11/17/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 17, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.50	315.00	157.50
11/18/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 18, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.20	315.00	378.00
11/19/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 19, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.90	315.00	913.50
11/20/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for late November 19 and November 20, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	3.20	315.00	1,008.00
11/23/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 21 through November 23, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.30	315.00	409.50



PROMESA - Official Committee of Unsecured Creditors  
12272-001  
Invoice No. 100101

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11/24/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 24, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.40	315.00	441.00
11/25/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 25, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.90	315.00	283.50
11/30/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for November 28 through November 30, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.60	315.00	504.00
<b>Subtotal: B113 / Pleadings Review</b>			30.00		\$9,450.00
<b>B150 / Meetings of Creditors</b>					
11/10/20	JA	Confer with Committee Chair regarding litigation issues.	0.40	575.00	230.00
11/11/20	JA	Attend Committee Call regarding case strategy.	0.40	575.00	230.00
11/24/20	JA	Attend Committee meeting regarding case issues and litigation strategy.	0.50	575.00	287.50
11/24/20	JA	Confer with Committee Chair regarding litigation issues.	0.10	575.00	57.50
<b>Subtotal: B150 / Meetings of Creditors</b>			1.40		\$805.00
<b>B160 / Fee/Employment Applications</b>					
11/04/20	CBH	Meeting with C. Esser regarding August invoice and status.	0.30	195.00	58.50
11/05/20	CBH	E-mail correspondence with J. Arrastia regarding August and September invoices for fee application (.2); meeting with M. Guitian regarding same (.2).	0.40	195.00	78.00
11/06/20	CBH	E-mail correspondence with accounting regarding reports for fee application (.5); receipt and review of reports (.5); preparation of expenses and fees for fee application exhibits (.5); change dates to August 31st (.5); review of edits to fee application (.6).	2.60	195.00	507.00
11/09/20	CBH	Continue preparation of fourth interim fee application (.5); preparation of exhibits and case information (.5); review of billing reports (.5); e-mail to accounting regarding additional report information (.5); review of case background (.5); review of budget information (.5); e-mail correspondence regarding same (.2).	2.90	195.00	565.50

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
Invoice No. 100101

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11/10/20	CBH	Continue preparation of fourth interim fee application (.5); continue preparation of exhibits and review of bill and payment report (.5); calculation of amounts paid and amounts owed (.5); multiple e-mail correspondence with accounting regarding reports (.5); review of monthly budgets (.5); review of invoices (.5).	3.20	195.00	624.00
11/11/20	JA	Redact fee statements for submission.	0.40	575.00	230.00
11/12/20	MGG	Review draft email for service of August Invoices.	0.30	575.00	172.50
11/12/20	CBH	Finalization of draft fourth interim fee application (.5); addition of case background (.5); review of statements; receipt and review of August fee letter (.4); organization of exhibits; meeting with M. Guitian regarding same (.4).	1.80	195.00	351.00
11/12/20	CE	Finalize and serve August Fee Statement on U.S. Trustee for the District of Puerto Rico, Oversight Board and Fee Examiner; E-mail correspondence with M. Guitian re: same.	0.80	150.00	120.00
11/12/20	JZ	Conference with C. Hopkins regarding Fee Application; review of draft of same.	0.50	195.00	97.50
11/13/20	CBH	Attention to hearing date and objection deadline of fee application; update (.4); attention to organization of exhibits; send updated draft to M. Guitian for review (.4).	0.80	195.00	156.00
11/15/20	JA	Prepare Fee Applications.	0.60	575.00	345.00
11/15/20	MGG	Review email from John Arrastia with comments to Interim Fee Application (.30). Review and revise Fourth Interim Fee Application (1.0).	1.30	575.00	747.50
11/16/20	MGG	Review email from C. Hopkins and confer re: copy of revised Fourth Interim Fee (.20). Confirm withholding amounts and other interim payments with Accounting (.40). Follow up emails to and from Ms. Hopkins re: redactions (.30). Review, finalize and approve for filing (.90).	1.80	575.00	1,035.00
11/16/20	CBH	Final preparation (.5); edits to and filing fourth interim fee application and notice of hearing (.5); meeting with J. Zamora regarding filing (.5); attention to redacted invoices and finalization of exhibits (.5).	2.20	195.00	429.00
11/16/20	JZ	Conference with C. Hopkins regarding Fee Application.	0.30	195.00	58.50
11/19/20	JZ	Conference with C. Hopkins regarding service of GJB's Fourth Interim Fee Application and retrieve master service list for the month of November (.3); serve Fee Application via e-mail and/or mail upon all parties on the 22 page service list (1.0); draft and file Certificate of Service on the same (.6)	1.90	195.00	370.50
11/23/20	MGG	Email to and from Carolyn Esser re: Promesa August Fee Letter.	0.30	575.00	172.50
11/25/20	CE	Finalize and serve Monthly Fee Objection Statement for August. E-mails with V. Soler.	0.40	150.00	60.00

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
Invoice No. 100101

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11/30/20	JA	Revise September Fee Statements to conform with Fee Examiner guidelines.	1.60	575.00	920.00
<b>Subtotal: B160 / Fee/Employment Applications</b>			24.40		\$7,098.00
<b>B161 / Budgeting</b>					
11/23/20	JA	Prepare and review budget for December.	1.10	575.00	632.50
11/24/20	JA	Revise budget per Committee Chair.	0.30	575.00	172.50
11/25/20	MGG	Review revised December Budget and serve.	0.30	575.00	172.50
<b>Subtotal: B161 / Budgeting</b>			1.70		\$977.50
<b>B191 / General Litigation</b>					
11/03/20	JA	Confer with counsel for National regarding follow up to Motion for Investigation.	1.10	575.00	632.50
11/04/20	JHG	Review email from Alex Bongartz.	0.30	765.00	229.50
11/04/20	JHG	Review agenda for committee call.	0.20	765.00	153.00
11/04/20	JHG	Review additional email from Alex Bongartz.	0.20	765.00	153.00
11/04/20	JHG	Review (ECF 15020) order denying motion to terminate Prepa 9019 motion.	0.30	765.00	229.50
11/04/20	JA	Review Order Denying Motion to Terminate UCC Motion to Terminate Bankruptcy Rule 9019.	0.20	575.00	115.00
11/09/20	JHG	Review and analysis of email from Alex Bongartz and provide direction to litigation team.	0.60	765.00	459.00
11/09/20	JHG	Review Securities Industry and Financial Markets amicus brief regarding revenue bonds.	1.10	765.00	841.50
11/09/20	JHG	Review and analyze issues regarding revenue bond litigation.	0.70	765.00	535.50
11/09/20	AMC	Review and analysis of Joint Status Report of Movant Ambac Assurance Corporation and Respondents the Financial Oversight and Management Board for Puerto Rico, as Representative of the Commonwealth of Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority with Respect to the Rule 2004 Motions.	0.30	375.00	112.50
11/10/20	JHG	Review email from Alex Bongartz.	0.30	765.00	229.50
11/10/20	JHG	Review and consider agenda for committee call and related issues.	0.40	765.00	306.00

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
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11/10/20	JHG	Review First Circuit order regarding jurisdictional issues.	0.20	765.00	153.00
11/11/20	JHG	Review emails from A. Castaldi and review revised draft intervention motion.	2.20	765.00	1,683.00
11/12/20	JMS	Attention to GJB vendor avoidance actions, proposed action and default issues.	2.40	500.00	1,200.00
11/13/20	JHG	Review email from Alex Bongartz and provide instruction to litigation team.	0.40	765.00	306.00
11/13/20	JHG	Review ECF 15085 and 15086, transfer of claims to ADR.	0.90	765.00	688.50
11/16/20	JHG	Review issues regarding potential motion to dismiss and emails and analysis regarding PREPA litigation.	1.20	765.00	918.00
11/16/20	JMS	Review issues related to plan of adjustment and litigation filed by committee	2.50	500.00	1,250.00
11/17/20	JMS	Continued review of issues related to plan of adjustment and litigation filed by committee	2.50	500.00	1,250.00
11/19/20	JHG	Review email from Alex Bongartz attaching motion to identify litigation issues.	0.40	765.00	306.00
11/19/20	JHG	Review and analysis of PREPA motion to assume.	0.80	765.00	612.00
11/19/20	JZ	Receipt and review of the Fourth Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the FOMB to (I) Establish Litigation Case Management Procedures and (II) Establish Procedures for Approval of Settlements [ECF No. 15189] and Order Setting Briefing Schedule on same [ECF No. 15195] relating to ADV. No. 19-276, 19-277 and 19-279; calendar response deadlines; update electronic case profile.	0.40	195.00	78.00
11/20/20	JA	Review recap of FOMB meeting and related materials.	0.40	575.00	230.00
11/23/20	JHG	Review and analysis of email from Alex Bongartz to evaluate litigation issues.	0.60	765.00	459.00
11/23/20	JA	Review AMBAC Motion for 2004 Discovery (.5); review Motion for Joinder (.2); review Order of Reference to Magistrate Judge (.1)	0.80	575.00	460.00
11/24/20	JHG	Review and analysis of ECF 15520, Ambac motion regarding discovery regarding restricted/unrestricted cash.	1.10	765.00	841.50
11/24/20	JHG	Review proposed agenda for committee call.	0.20	765.00	153.00
11/24/20	JHG	Review and analysis of email from Alex Bongartz.	0.60	765.00	459.00

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
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11/24/20	JA	Review Order on Briefing Schedule (.1); review proposed status report regarding sealed information in 926 (.2); review limited objection to settlement agreement with Gracia-Gracia (.6)	0.90	575.00	517.50
11/24/20	JA	Confer with co-counsel regarding confidentiality.	0.40	575.00	230.00
11/30/20	JA	Review memorandum from mediation team (.3); review materials regarding critique or certified fiscal plan and distributable cash (1.8)	2.10	575.00	1,207.50
11/30/20	JMS	Review matters related to default judgments and vendor avoidance actions.	1.40	500.00	700.00
11/30/20	JZ	Receipt and review of Fourth Joint Status Report of the UCC and SCC Concerning Information Filed Under Seal in Connection with the Committee's Motion for Order to Pursue Certain Causes of Action on Behalf of Commonwealth [ECF No. 15291] and Order Establishing Procedure for Filings Due on December 1 in Light of CM/ECF Unavailability [ECF No. 15288]; circulate same; update electronic case profile.	0.40	195.00	78.00
<b>Subtotal: B191 / General Litigation</b>			<b>28.50</b>		<b>\$17,776.50</b>
<b>Total</b>			<b>93.80</b>		<b>\$37,604.00</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	12.70	765.00	9,715.50
JMS	Jesus M Suarez	Partner	8.80	500.00	4,400.00
MGG	Mariaelena Gayo-Guitian	Partner	4.00	575.00	2,300.00
JA	John Arrastia	Partner	11.30	575.00	6,497.50
JAD	Joyce A Delgado	Associate	30.00	315.00	9,450.00
AMC	Angelo M Castaldi	Associate	0.30	375.00	112.50
JNS	Jessey N Sardina	Paralegal	0.20	75.00	15.00
CE	Carolyn Esser	Paralegal	1.20	150.00	180.00
CBH	Colleen B Hopkins	Paralegal	14.20	195.00	2,769.00
JZ	Johana Zamora	Paralegal	11.10	195.00	2,164.50
<b>Total</b>			<b>93.80</b>		<b>\$37,604.00</b>

**Costs and incurrent and advanced**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Postage	210.00
11/30/2020	Data management and hosting (12272-001) Trustpoint.One 20-11401	7,098.84

**Total Costs incurrent and advanced**

**\$7,308.84**

**Current Fees and Costs**

**\$44,912.84**

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

January 14, 2021  
Please Refer to  
Invoice Number: 100102

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

---

**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services  
for the period ending Nov 30, 2020

27,809.50

Costs incurred and advanced

9.00

**Current Fees and Costs Due**

27,818.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.***

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

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PROMESA - Official Committee of Unsecured Creditors

January 14, 2021

Please Refer to

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Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

---

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Nov 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
11/02/20	JZ	Receipt and review of Marrero Plaintiff's Motion for Extension of Time to File Response to Counterclaim in ADV. 20-115; receipt and review of Order granting same; calendar response deadline; update electronic case profile.	0.40	195.00	78.00
11/04/20	JZ	Receipt and review of Order Denying the UCC's Motion to Terminate Bankruptcy Rule 9019 Motion [ECF No. 2287]; calendar deadline to file renewed motion; circulate same; update electronic case profile.	0.40	195.00	78.00
11/05/20	JZ	Review of calendar; conference with J. Arrastia regarding Monday's deadline to file response to Amended Complaint in ADV. 20-115 and strategy on case.	0.50	195.00	97.50
11/12/20	JZ	Revise, format, finalize and file the Notice of Voluntary Dismissal; Notice of Withdrawal; and Agreed Motion to Intervene in the Marrero Plaintiff's Adversary 20-00115; update electronic case profile.	1.00	195.00	195.00
11/13/20	JZ	Receipt and review of PREPA's Motion for Extension of Time to file Response in the Marrero Plaintiff's Adversary 20-00115 [ECF No. 20]; circulate same; update electronic case profile.	0.30	195.00	58.50
11/16/20	JZ	Receipt and review of Order Granting UCC's Agreed Motion to Intervene in the Marrero Plaintiff's Adversary 20-00115; circulate same; update electronic case profile.	0.30	195.00	58.50
11/16/20	JZ	Receipt and review of Order Granting PREPA's Motion for Extension of Time to file Response in the Marrero Plaintiff's Adversary 20-00115 [ECF No. 22]; calendar compliance deadline; circulate same; update electronic case profile.	0.30	195.00	58.50
11/17/20	JZ	Receipt and review of paperless Order Granting UCC's Notice of Voluntary Dismissal [ECF No. 23] and Order Granting UCC's Notice of Withdrawal entered in Marrero Plaintiff's ADV 20-115; circulate same; update electronic case profile.	0.20	195.00	39.00

PROMESA - Official Committee of Unsecured Creditors  
12272-002  
Invoice No. 100102

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11/24/20	JZ	Receipt and review of Joint Motion Urgent Consensual Motion for Extension of Certain Deadlines in Connection with Omnibus Motion of Puerto Rico Electric Power Authority for Order Approving PREPAs Rejection of Certain Power Purchase and Operating Agreements [ECF No. 2307]; circulate same; update electronic case profile.	0.30	195.00	58.50
11/25/20	JZ	Receipt and review of Order Setting Briefing Schedule on Joint Motion Urgent Consensual Motion for Extension of Certain Deadlines in Connection with Omnibus Motion of Puerto Rico Electric Power Authority for Order Approving PREPAs Rejection of Certain Power Purchase and Operating Agreements [ECF No. 2309]; circulate same; calendar hearing date and deadlines; update electronic case profile.	0.30	195.00	58.50
11/30/20	JZ	Receipt and review of PREPA's Motion for Extension of Time to file Response in the Marrero Plaintiff's Adversary 20-00115 [ECF No. 25]; circulate same; update electronic case profile.	0.30	195.00	58.50
<b>Subtotal: B110 / Case Administration</b>			4.30		\$838.50
<b>B150 / Meetings of Creditors</b>					
11/02/20	JA	Litigation update to client regarding AP115.	0.70	575.00	402.50
11/04/20	JA	Confer with Committee regarding litigation strategy.	0.60	575.00	345.00
<b>Subtotal: B150 / Meetings of Creditors</b>			1.30		\$747.50
<b>B191 / General Litigation</b>					
11/02/20	JHG	Review and analysis of example of stipulated intervention order and strategize.	0.80	765.00	612.00
11/02/20	JMS	Review issues concerning intervention and prosecution of declaratory relief action.	1.40	500.00	700.00
11/02/20	JA	Prepare for conference with counsel for FOMB regarding AP115 and review case file and relevant correspondence (.9); strategize regarding conference (.8); conference call with counsel for FOMB regarding AP 115 (.7); review exemplars of Orders granting limited intervention (.3); research cases in which limited intervention permitted (.6)	3.30	575.00	1,897.50
11/03/20	AMC	Research recent briefing concerning Puerto Rico Act 458 application	1.60	375.00	600.00
11/04/20	JA	Review and revise draft Intervention Motion and proposed Order.	0.70	575.00	402.50
11/04/20	JMS	Attention to issues concerning intervention and prosecution of declaratory relief action.	1.20	500.00	600.00
11/04/20	JA	Review Order Denying Motion to Terminate 9019 Motion (.2); memoranda Order Denying Reconsideration (.1)	0.30	575.00	172.50
11/05/20	JHG	Review committee response (ECF 30 in 19-00388).	0.80	765.00	612.00



PROMESA - Official Committee of Unsecured Creditors  
12272-002  
Invoice No. 100102

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11/05/20	JHG	Review email from Larry Rapport and analysis of issue regarding committee's withdrawal of counterclaim.	1.10	765.00	841.50
11/05/20	JA	Confer with Oversight Board counsel regarding intervention and prosecution of issues in AP 115 (.7); attention to Response to Amended Complaint (.8); strategize with John Genovese (.4); research legal analysis to supplement conferences with counsel for FOMB (.4)	2.30	575.00	1,322.50
11/05/20	AMC	Legal and factual research regarding motions for summary judgment pending claims in class action suit and in Adv. Proc. 19-388	1.20	375.00	450.00
11/05/20	AMC	Draft motion for intervention, review / research rules governing the same, and prepare proposed form of order concerning the same	2.60	375.00	975.00
11/06/20	JA	Confer with counsel for FOMB regarding negotiation with Plaintiff in AP 115 (.4); revise and finalize draft of Motion for Limited Intervention (.4); confer with counsel for FOMB regarding intervention (.2); confer with counsel for FOMB regarding legal research relating to AP 115 and AP 388 (.6)	1.60	575.00	920.00
11/06/20	JA	Review and analysis of memoranda regarding Fuel Oil Litigation claims and strategize regarding Marrero Plaintiff claims to prosecute.	0.80	575.00	460.00
11/06/20	AMC	Research of prior adversary proceedings involving Committee intervention and scope issues, and refresh First Circuit analysis concerning the same	1.40	375.00	525.00
11/06/20	AMC	Revise and supplemental research concerning internal, detailed memorandum concerning anticipated defenses / arguments set out by defendants in pending adversary proceeding	2.80	375.00	1,050.00
11/06/20	AMC	Review of recently-filed motions and filings concerning matters implicating extant adversary proceedings, including: ECF No. 15004 concerning expert testimony of Dr. Gonzalez, ECF No. 15020 concerning Committee's motion to terminate Rule 9019 motion, and ECF No. 15021 concerning ultra vires issues	0.60	375.00	225.00
11/09/20	JMS	Review issues concerning stipulation with FOMB/Marrero Plaintiffs and prosecution of declaratory action -115 case (1.4); research issues concerning standing, appellate standards (1.8)	3.20	500.00	1,600.00
11/09/20	JA	Confer with counsel to FOMB regarding Order on Intervention.	0.20	575.00	115.00
11/09/20	AMC	Review / analyze order of the Court denying motion of Official Committee of Unsecured Creditors to Terminate Bankruptcy Rule 9019 Motion.	0.20	375.00	75.00
11/11/20	JA	Review proposed revisions to Motion to Intervene and Order (.4); email to opposing counsel regarding revisions (.2)	0.60	575.00	345.00

PROMESA - Official Committee of Unsecured Creditors  
12272-002  
Invoice No. 100102

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11/11/20	JMS	Continued review of issues concerning stipulation with FOMB/Marrero Plaintiffs and prosecution of declaratory action -115 case (1.8); research issues concerning standing, appellate standards (2.4)	4.20	500.00	2,100.00
11/12/20	JA	Review Notice of Withdrawal (.1); confer with FOMB counsel (.2); finalize Motion to Intervene, Withdrawal and Dismissal (.3)	0.60	575.00	345.00
11/12/20	AMC	Finalize filings in Adv. Proc. 20-115, and attend to filing process	0.70	375.00	262.50
11/13/20	JMS	Attention to advancement of claims against fuel oil defendants	2.30	500.00	1,150.00
11/15/20	JA	Review court orders regarding AP 115 (.2); confer with counsel for FOMB regarding litigation procedures in AP 115 (.2)	0.40	575.00	230.00
11/16/20	JA	Revise Motion to Terminate PREPA contracts and declarations (.3); review correspondence to Plaintiffs' counsel (.1); strategize regarding dispositive motions (.6); confer with FOMB counsel (.1); review court orders (.1) .	1.20	575.00	690.00
11/18/20	JHG	Review ECF 15189 - Fourth Omnibus Motion to Extend Deadlines and analysis of same.	0.20	765.00	153.00
11/18/20	JHG	Review email from Rachel O'Connor regarding notice of agenda for matters scheduled for hearing.	0.40	765.00	306.00
11/20/20	JA	Confer with FOMB counsel at Proskauer regarding case issues and status in AP 115.	0.20	575.00	115.00
11/20/20	JMS	Review issues concerning litigation strategy and development of briefing materials adverse to Marrero Plaintiffs in -115 litigation.	0.70	500.00	350.00
11/23/20	JA	Review Motion to Assume Power Agreements.	0.30	575.00	172.50
11/23/20	AMC	Detailed research concerning notions of creditor standing, derivative versus non-derivative claims, and stay issues	2.20	375.00	825.00
11/24/20	PTK	Legal research and analysis regarding exceptions permitting materials to be incorporated into Motion to Dismiss as it relates to AP 115.	2.80	310.00	868.00
11/25/20	PTK	Continued, detailed legal research and analysis regarding permissible scope of documents that may be considered by court at Motion to Dismiss stage with respect to Motion to Dismiss and preparation of internal memorandum.	2.20	310.00	682.00
11/25/20	AMC	Continue research of authorities, mainly in 1st, 2nd, and 3d Circuits, concerning "derivative" claims and, additionally, various 2d Circuit / SDNY decisions arising from Madoff litigation addressing that "derivative" standing issue	2.30	375.00	862.50
11/30/20	PTK	Finalize memorandum on research regarding documents that may be considered under Rule 12(b) on Plaintiff's declaratory judgment claims in AP 115.	1.40	310.00	434.00

PROMESA - Official Committee of Unsecured Creditors  
12272-002  
Invoice No. 100102

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11/30/20	AMC	Attend to drafting of joinder / brief in support of dismissal of complaint filed in Case No. 20-115	5.50	375.00	2,062.50
<b>Subtotal: B191 / General Litigation</b>			56.30		\$26,108.50
<b>B260 / Meetings of and Communications with Board</b>					
11/24/20	JA	Confer with counsel for PREPA regarding status of AP 115	0.20	575.00	115.00
<b>Subtotal: B260 / Meetings of and Communications with Board</b>			0.20		\$115.00
<b>Total</b>			<b>62.10</b>		<b>\$27,809.50</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	3.30	765.00	2,524.50
JMS	Jesus M Suarez	Partner	13.00	500.00	6,500.00
JA	John Arrastia	Partner	14.00	575.00	8,050.00
PTK	Patrick T Kalbac	Associate	6.40	310.00	1,984.00
AMC	Angelo M Castaldi	Associate	21.10	375.00	7,912.50
JZ	Johana Zamora	Paralegal	4.30	195.00	838.50
<b>Total</b>			<b>62.10</b>		<b>\$27,809.50</b>

**Costs and incurrent and advanced**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	9.00
<b>Total Costs incurrent and advanced</b>		<b>\$9.00</b>
<b>Current Fees and Costs</b>		<b>\$27,818.50</b>

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

January 14, 2021  
Please Refer to  
Invoice Number: 100103

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the  
~~Government - Commonwealth of Puerto Rico~~

---

**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-003

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government  
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services  
for the period ending Nov 30, 2020

5,693.00

Costs incurred and advanced

**Current Fees and Costs Due**

5,693.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.***

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

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Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

January 14, 2021

Please Refer to

Invoice Number: 100103

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the  
~~Government Commonwealth of Puerto Rico~~

---

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Nov 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
11/03/20	JZ	Receipt and review of Order Setting Briefing Schedule on the UCC's Motion to Exclude Expert Testimony of Dr. Laura Gonzalez on Ultra Vires Issues and Motion to Strike Declaration of John Faith and Accompanying Exhibit from the Motion of the Bank of New York Mellon filed in ERS ADV Case Nos. 19-356, 19-357, 19-359 and 19-361; calendar deadlines for response and reply; circulate same; update electronic case profile.	0.40	195.00	78.00
11/04/20	JZ	Receipt and review of Joinder of Defendant 7Y to ERS Bondholders' Brief in Opposition to Committees' Motion for Summary Judgment filed in ADV. 19-356; circulate same; update electronic case profile.	0.30	195.00	58.50
11/04/20	JZ	Receipt and review of Joinder of Defendant Roche U.S. Retirement Plans Master Trust's to ERS Bondholders' Brief in Opposition to Committees' Motion for Summary Judgment filed in ADV. 19-361; circulate same; update electronic case profile.	0.30	195.00	58.50
11/19/20	JZ	(ADV 19-357) Receipt and review of Committee's Reply in Support of their Motion for Summary Judgment on Ultra Vires Issues [ECF No. 150] (.2); ERS Bondholders Reply In Support Of Motion For Partial Summary Judgment On Ultra Vires Issues [ECF No. 151] (.2); ERS Bondholders Opposition To Committees Motion To Exclude Expert Testimony Of Dr. Laura Gonzalez [ECF No. 152] (.2); Declaration Of Sparkle L. Sooknanan In Support Of ERS Bondholders Opposition To Committees Motion To Exclude Expert Testimony Of Dr. Laura Gonzalez [ECF No. 153]; update electronic case profile. (.2)	0.80	195.00	156.00

PROMESA - Official Committee of Unsecured Creditors  
12272-003  
Invoice No. 100103

Page 2

11/19/20	JZ	(ADV 19-359) Receipt and review of Committee's Reply in Support of their Motion for Summary Judgment on Ultra Vires Issues [ECF No. 129] (.2); ERS Bondholders Reply In Support Of Motion For Partial Summary Judgment On Ultra Vires Issues [ECF No. 130] (.2); ERS Bondholders Opposition To Committees Motion To Exclude Expert Testimony Of Dr. Laura Gonzalez [ECF No. 131] (.2); Declaration Of Sparkle L. Sooknanan In Support Of ERS Bondholders Opposition To Committees Motion To Exclude Expert Testimony Of Dr. Laura Gonzalez [ECF No. 132]; update electronic case profile.(.2)	0.80	195.00	156.00
11/19/20	JZ	(ADV 19-361) Receipt and review of Committee's Reply in Support of their Motion for Summary Judgment on Ultra Vires Issues [ECF No. 133] (.2); ERS Bondholders Reply In Support Of Motion For Partial Summary Judgment On Ultra Vires Issues [ECF No. 134] (.2); ERS Bondholders Opposition To Committees Motion To Exclude Expert Testimony Of Dr. Laura Gonzalez [ECF No. 135] (.2); Declaration Of Sparkle L. Sooknanan In Support Of ERS Bondholders Opposition To Committees Motion To Exclude Expert Testimony Of Dr. Laura Gonzalez [ECF No. 136]; update electronic case profile (.2)	0.80	195.00	156.00
11/19/20	JZ	(ADV 19-356) Receipt and review of Committee's Reply in Support of their Motion for Summary Judgment on Ultra Vires Issues [ECF No. 146]; ERS Bondholders Reply In Support Of Motion For Partial Summary Judgment On Ultra Vires Issues [ECF No. 147]; ERS Bondholders Opposition To Committees Motion To Exclude Expert Testimony Of Dr. Laura Gonzalez [ECF No. 148]; Declaration Of Sparkle L. Sooknanan In Support Of ERS Bondholders Opposition To Committees Motion To Exclude Expert Testimony Of Dr. Laura Gonzalez [ECF No. 149]; update electronic case profile.	0.80	195.00	156.00
11/19/20	JZ	(ADV 19-367) Receipt and review of ERS' Reply Memorandum in Support of Motion Pursuant to Bankruptcy Rule 7056 for Summary Judgment [ECF No. 136] (.2); Plaintiffs Reply to Defendants Response to Statement of Material Undisputed Facts [ECF No. 137] (.2); Plaintiff's Response to Defendants Evidentiary Objections to the Declaration of Cecile Tirado Soto [ECF No. 138] (.2); Joinder Of Plaintiff-Intervenor The Official Committee Of Retired Employees To Reply Memorandum of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, by and through the Financial Oversight and Management Board, in Support of Motion for Summary Judgment [ECF No. 139] (.1); Defendants Reply In Support Of Motion For Partial Summary Judgment On Lien Scope Issues [ECF No. 140] (.2); Declaration Of Sparkle L. Sooknanan In Support Of Defendants Reply In Support Of Motion For Partial Summary Judgment On Lien Scope Issues [ECF No. 141]; update electronic case profile. (.2)	0.90	195.00	175.50

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11/20/20	JZ	Receipt and review of Response of the Bank of NY to Committees' Motion to Strike Declaration of John Faith and Accompanying Exhibit From Motion for Summary Judgment Regarding Ultra Vires challenge [ECF No. 15201] and Reply of the Bank of NY Mellon to the Response of Committees to (I) ERS Bondholders' Motion for Partial Summary Judgment on Ultra Vires Issues and Proceedings; and (II) Motion of the Bank of NY Mellon for Summary Judgment Pursuant to Fed. R. Civ. P. 56 Regarding Ultra Vires challenge [ECF No. 15202]; update electronic case profile.	0.40	195.00	78.00
11/24/20	JZ	Receipt and review of Defendants Motion to Strike Plaintiffs Reply to Defendants Response to Statement of Material Undisputed Facts filed in ADV. 19-367; circulate same; update electronic case profile.	0.40	195.00	78.00
11/25/20	JZ	Receipt and review of Order Setting Briefing Schedule on Defendants Motion to Strike Plaintiffs Reply to Defendants Response to Statement of Material Undisputed Facts filed in ADV. 19-367; circulate same; calendar deadlines; update electronic case profile.	0.30	195.00	58.50
11/30/20	JZ	Receipt and review of UCC's Fifth Supplemental Informative Motion Regarding Notices of Participation and Notices of Appearance Filed in Connection With Objections to ERS Bond Claims [ECF No. 1038]; update electronic case profile.	0.30	195.00	58.50
<b>Subtotal: B110 / Case Administration</b>			6.50		\$1,267.50
<b>B191 / General Litigation</b>					
11/02/20	JA	Review Order on Briefing Schedule to exclude expert testimony in various adversary proceedings.	0.10	575.00	57.50
11/04/20	JA	Review Motion for Joinder (.2); review correspondence regarding claims relating to 19-361 (.1)	0.30	575.00	172.50
11/19/20	JA	Review Reply to Response to Statement of Facts regarding Motion for Summary Judgment in AP 19-367 (1.6); Response to Defendants Evidentiary Objections to Declaration of Soto (.3); review Reply to Response to Motion on Ultra Vires for Summary Judgment (.8); review Reply on Ultra Vires Summary Judgment in AP 19-356 (.6); review Reply on Ultra Vires Summary Judgment in AP 357 (.3); review Reply in AP 359 (.4); review Reply to MSJ on Ultra Vires in AP 361 (.4); Reply to exclude Testimony (.6)	5.00	575.00	2,875.00
11/24/20	JHG	Review orders dismissing taking clause litigation brought by ERS bondholders.	1.20	765.00	918.00
11/24/20	JA	Review Motion to Strike Plaintiffs' Reply to Statement of Undisputed Facts.	0.30	575.00	172.50
11/25/20	JA	Review Briefing Schedule on Motion to Strike (.1); review Motion for Default (.3)	0.40	575.00	230.00
<b>Subtotal: B191 / General Litigation</b>			7.30		\$4,425.50

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<b>Total</b>	<b>13.80</b>	<b>\$5,693.00</b>
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**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	1.20	765.00	918.00
JA	John Arrastia	Partner	6.10	575.00	3,507.50
JZ	Johana Zamora	Paralegal	6.50	195.00	1,267.50
<b>Total</b>			<b>13.80</b>		<b>\$5,693.00</b>

<b>Current Fees and Costs</b>	<b>\$5,693.00</b>
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**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 8, 2021  
Please Refer to  
Invoice Number: 100333

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

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**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-001  
PROMESA - Official Committee of Unsecured Creditors  
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services  
for the period ending Dec 31, 2020

42,505.73

Costs incurred and advanced

8,098.94

**Current Fees and Costs Due**

50,604.67

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.***

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 8, 2021

Please Refer to

Invoice Number: 100333

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Dec 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
12/01/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.30	195.00	58.50
12/02/20	JZ	Receipt and review of Order Regarding Procedures for December 9-10, 2020 Omnibus Hearing [ECF No. 15295]; circulate same; calendar participation deadline; update electronic case profile.	0.30	195.00	58.50
12/02/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.40	195.00	78.00
12/03/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.50	195.00	97.50
12/04/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.40	195.00	78.00
12/07/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.40	195.00	78.00
12/08/20	JZ	Receipt and review of Oversight Board's Status Report in Connection with the December 9-10 Omnibus Hearing [ECF No. 15388] and Notice of Amended Agenda of Matters Scheduled for the Hearing [ECF No. 15376]; circulate same; update electronic case profile.	0.40	195.00	78.00
12/08/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.50	195.00	97.50
12/09/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.30	195.00	58.50

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12/10/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.40	195.00	78.00
12/11/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.40	195.00	78.00
12/14/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.30	195.00	58.50
12/15/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.50	195.00	97.50
12/16/20	JZ	Receipt of Text Order Granting A. Castaldi's Admission [ECF No. 15450]; serve copy of Application and Order for Pro Hac Vice Admission via U.S. Mail to the parties on the master service list; e-mails to and from J. Perez to confirm service to proceed with filing of a Certificate of Service.	1.50	195.00	292.50
12/16/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.30	195.00	58.50
12/17/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.40	195.00	78.00
12/21/20	JNS	Emails with Jesus M Suarez regarding Tolling Agreement upcoming deadlines.	0.20	75.00	15.00
12/21/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.50	195.00	97.50
12/22/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.30	195.00	58.50
12/28/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.50	195.00	97.50
12/29/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.30	195.00	58.50
12/30/20	JZ	Review of daily summary prepared by J. Delgado; update master calendar; update attorney calendar and follow up; circulate.	0.40	195.00	78.00
12/31/20	JZ	Review of daily summary prepared by J. Delgado.	0.30	195.00	58.50
<b>Subtotal: B110 / Case Administration</b>			9.80		\$1,887.00

**B113 / Pleadings Review**

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12/01/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 1, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.80	315.00	567.00
12/02/20	JAD	Conference call with counsel for Creditors' Committee to discuss status of proceedings, pertinent litigation issues, pending motions, and budget (.5); review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 2, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (1.4)	1.90	315.00	598.50
12/03/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 3, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.70	315.00	535.50
12/04/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 4, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.60	315.00	504.00
12/07/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 7, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.80	315.00	567.00
12/08/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 8, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (.9)	2.90	315.00	913.50
12/09/20	JAD	Conference call with counsel for Creditors' Committee to discuss status of proceedings, pertinent litigation issues, pending motions, and budget (.5); review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 9, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (3.7)	4.20	315.00	1,323.00
12/11/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 11, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.90	315.00	283.50

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12/17/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 17, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.50	315.00	472.50
12/18/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 18, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.40	315.00	441.00
12/21/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 19 through December 21, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.90	315.00	598.50
12/22/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 22, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.50	315.00	157.50
12/23/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 23, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.60	315.00	504.00
12/28/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 24 through December 28, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.10	315.00	661.50
12/29/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 29, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.20	315.00	378.00
12/30/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 30, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.40	315.00	441.00
<b>Subtotal: B113 / Pleadings Review</b>			<b>28.40</b>		<b>\$8,946.00</b>

**B150 / Meetings of Creditors**

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12/02/20	JMS	Prepare for and attend committee meeting, forward meeting notes to team in support of litigation efforts.	1.30	500.00	650.00
12/08/20	JA	Confer with A. Velazquez regarding litigation strategy.	0.20	575.00	115.00
<b>Subtotal: B150 / Meetings of Creditors</b>			1.50		\$765.00
<b>B160 / Fee/Employment Applications</b>					
12/08/20	JZ	Receipt and review of Partially Amended Omnibus Order Awarding Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Eighth Interim Fee Period [ECF No. 15370] awarding GJB attorney's fees and costs; update electronic case profile.	0.30	195.00	58.50
12/09/20	CBH	Review of amended fee order; comparison of GJB fees; e-mail to J. Arastia regarding same.	0.40	195.00	78.00
12/14/20	JZ	Conferences with A. Castaldi and J. Perez regarding the finalization and filing of A. Castaldi's Pro Hac Vice Admission and procedure for same; confirm filing for tomorrow.	0.50	195.00	97.50
12/15/20	JZ	Receipt and review of the file Pro Hac Vice Admission for A. Castaldi; conference with J. Perez regarding service of same.	0.30	195.00	58.50
12/17/20	MGG	Review email from J. Arrastia and status of September Fee Statements and coordinate with Carolyn Esser service of same.	0.40	575.00	230.00
12/17/20	CE	Preparation of Monthly Fee Cover Letter for September including Declaration; Preparation of detailed draft e-mail for service; E-mail correspondence with K. Forrest and M. Guitian.	0.80	150.00	120.00
12/17/20	CE	Finalize and serve the September Monthly Fee Statement on fee examiner, U.S. Trustee for the District of Puerto Rico and oversight board.	0.30	150.00	45.00
12/30/20	MGG	Review email from John Arrastia and Nicholas Hahn re: Fee Application and LEDES files and follow up by Ken Forrest.	0.30	575.00	172.50
<b>Subtotal: B160 / Fee/Employment Applications</b>			3.30		\$860.00
<b>B161 / Budgeting</b>					
12/14/20	JA	Prepare January budget.	0.60	575.00	345.00
12/14/20	JA	Finalize September fee statements.	0.60	575.00	345.00
12/21/20	JA	Finalize Fee Statements to conform with Fee Examiner guidelines.	0.60	575.00	345.00
12/23/20	MGG	Review email from John Arrastia re: January Budget. Review and serve on Fee Examiner.	0.30	575.00	172.50

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12/30/20	JA	Extensive email correspondence with Fee Examiner counsel and research responses to request regarding redacted files.	0.70	575.00	402.50
<b>Subtotal: B161 / Budgeting</b>			2.80		\$1,610.00
<b>B191 / General Litigation</b>					
12/01/20	JA	Review revisions to Motion for Default Judgment - Puerto Nuevo (.4); review CFP critique materials (1.6); confer with mediation team (.2); confer with SCC counsel regarding Motion for Default - Puerto Nuevo (.2)	2.40	575.00	1,380.00
12/01/20	JMS	Research litigation issues that may arise relating to mediation session on 12/3 and provide input to J. Arrastia.	0.80	500.00	400.00
12/01/20	AMC	Review of substantive changes to creditor parties' analysis concerning the Commonwealth's final fiscal plan critique and cash presentation, and begin analysis of the final Creditors' Perspectives on the Certified Fiscal Plan "deck".	0.80	375.00	300.00
12/01/20	AMC	Review and analyze the Court's Order Regarding Procedures for December 9-10, 2020 Omnibus Hearing at 9:30 a.m.	0.20	375.00	75.00
12/02/20	JHG	Review creditors perspective on distributable cash analysis and debt sustainable analysis.	1.30	765.00	994.50
12/02/20	JHG	Review creditors perspective on certified fiscal plan, review and analysis of issues raised regarding mediation in email from J. Suarez.	0.80	765.00	612.00
12/02/20	JMS	Research issues concerning mediation and plan of adjustment and advise litigation team concerning same.	1.70	500.00	850.00
12/02/20	JZ	Receipt and review of Order Modifying Briefing Schedule in the Vendor Action filed in ADV. Nos. 19-276, 19-277 and 19-279; calendar deadlines contained in order and hearing date; update each electronic case profile.	0.50	195.00	97.50
12/03/20	JMS	Review and research issues arising from mediation session on 12/3 and provide input to J. Arrastia.	0.70	500.00	350.00
12/03/20	AMC	Prepare for and attend virtual meeting at 9:30 am ET hosted by the Honorable Judge Hauser concerning Creditors' Perspectives on the Certified Fiscal Plan, review, and analyze exhaustive creditor decks / analyses concerning the same.	5.20	375.00	1,950.00
12/04/20	JMS	Continued research of issues raised at 12/3 mediation session with respect to unfair discrimination and attention to potential advancement of adversary proceeding -283	2.40	500.00	1,200.00
12/04/20	JZ	Receipt and review of the Oversight Board's Status Report Regarding COVID-19 Pandemic and Proposed Disclosure Statement [ECF No. 15345]; circulate same; update electronic case profile.	0.30	195.00	58.50

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12/04/20	JZ	Receipt and review of Ambac Assurance Corporation's Urgent Motion for Entry of Order Authorizing Third-Party Discovery Under Bankruptcy Rule 2004 Concerning Pension Liabilities [ECF No. 15342]; circulate same; update electronic case profile.	0.30	195.00	58.50
12/07/20	JHG	Review Oversight Board's status report (ECF 15345).	0.40	765.00	306.00
12/07/20	JHG	Review and analysis of ECF 15325, reply regarding assumption of class action plaintiffs settlement.	0.50	765.00	382.50
12/07/20	JHG	Review and analysis of memorandum from Judge Hauser regarding follow up and scheduling.	0.20	765.00	153.00
12/07/20	JHG	Review ECF 15352, stipulation regarding PSA creditors and Ambac.	0.50	765.00	382.50
12/07/20	JA	Review notes of creditor mediation session (.6); review update from mediation team (.1); review Oversight Board's status report (.2)	0.90	575.00	517.50
12/07/20	JZ	Receipt and review of Order Referring Ambac Assurance Corporation's Urgent Motion for Entry of Order Authorizing Third-Party Discovery Under Bankruptcy Rule 2004 to the General Magistrate [ECF No. 15354] (.1); the UCC's Joinder to Ambac's Motion [ECF No. 15358] (.2); and the Order Setting Briefing Schedule on same [ECF No. 15364] calendar deadlines (.2); circulate filings and update electronic case profile (.2)	0.70	195.00	136.50
12/08/20	JHG	Review ECF 15376 agenda for omnibus hearings on December 9, 2020.	0.70	765.00	535.50
12/08/20	JHG	Review response to fiscal plan critique.	0.80	765.00	612.00
12/08/20	JHG	Review and analysis of email from J. Delgado to identify and analyze strategic litigation issues.	0.50	765.00	382.50
12/08/20	JA	Review status report of FOMB (.2); confer with counsel regarding extension Motion for Default Judgment (.2); review Board's responses presentation (.8); review status report of AAFAF (.2); review creditors' prospectus on distributable cash (.6)	2.00	575.00	1,150.00
12/08/20	JMS	Review issues concerning default judgments in PROMESA matters.	0.70	500.00	350.00
12/08/20	AMC	Analyze joinder of Committee [DE 15358] to Ambac motion concerning third party Rule 2004 discovery, and Ambac's motion relating to said joinder.	0.20	375.00	75.00
12/08/20	AMC	Analyze and review stipulation [DE15352] of PSA creditors binding said creditors to prior confidentiality arrangement dated March 2014.	0.20	375.00	75.00
12/08/20	JZ	Receipt and review of AAFAF's Status Report Regarding the Government of Puerto Rico's Response to the Ongoing COVID-19 Pandemic and Transition; circulate same; update electronic case profile.	0.30	195.00	58.50



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12/09/20	JHG	Review (ECF 15342) Ambac motion for third party discovery regarding pensions.	1.10	765.00	841.50
12/09/20	JHG	Review ECF 15358, UCC joinder in Ambac 2004 motion.	0.30	765.00	229.50
12/09/20	JA	Omnibus hearing attendance.	0.80	575.00	460.00
12/09/20	JA	Review Creditors' prospectus on distributable cash (1.1); review government status report (.2)	1.30	575.00	747.50
12/09/20	JMS	Work on development of issues related to confirmation and plan of adjustment including research concerning valuation of litigation for plan purposes.	2.30	500.00	1,150.00
12/09/20	AMC	Analyze and consider government of Puerto Rico's response deck regarding creditor's prospectus on certified fiscal plan and sustainability and compare same against deck distributed by creditor parties.	0.40	375.00	150.00
12/09/20	AMC	Detailed analysis and consideration of the FOMB's 77-page "Response to CW fiscal plan critique" with particular focus on funds available for possible distribution to unsecured creditors and revenue projecting and "structural" reforms that may impact recoveries/revenues.	1.80	375.00	675.00
12/09/20	JZ	Receipt and review of the Status Report of the Government Parties Regarding the COVID-19 Pandemic and the 9019 Motion [ECF No. 15400]; circulate same; update electronic case profile.	0.30	195.00	58.50
12/10/20	AMC	In advance of mediation session, analyze and consider municipal debt maturity analysis.	0.30	375.00	112.50
12/10/20	AMC	Prepare for and attend confidential mediation session led by the Honorable Judge Hauser at 9:30 a.m.	3.10	375.00	1,162.50
12/11/20	JA	Review draft Motion for Default Judgment from SCC.	0.40	575.00	230.00
12/11/20	JMS	Attention to default judgment issues concerning vendor avoidance actions (.7)	0.70	500.00	350.00
12/11/20	AMC	Prepare for and attend 9:30 a.m. mediation session conducted by the Honorable Judge Hauser concerning inter alia perspectives, on distributable cash (2.1); and analyze credits analysis / "deck" in preparation for such mediation session (1.1)	3.20	376.01	1,203.23
12/14/20	JHG	Review ECF 47 in 18-00090, United States memorandum regarding constitutionality of Promesa.	0.80	765.00	612.00
12/15/20	JHG	Review Doc 45 in Case 18-00090.	0.80	765.00	612.00
12/15/20	JHG	Review Oversight Board memorandum of law in response to motion to dismiss on constitutionality issues.	0.70	765.00	535.50

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
Invoice No. 100333

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12/15/20	JHG	Review mediation update and analysis of distributable cases.	1.00	765.00	765.00
12/15/20	JA	Review case files for various motions for default.	0.70	575.00	402.50
12/15/20	JA	Review and analyze Ninth Supplemental Statement of Ad Hoc GO Bondholder.	0.30	575.00	172.50
12/16/20	JA	Prepare presentation for Committee call (.2); attend Committee call and present on litigation strategy (.4)	0.60	575.00	345.00
12/17/20	JA	Review Creditor Presentation on cash.	0.80	575.00	460.00
12/21/20	JHG	Review ECF 15476, urgent consensual motion regarding approval of Prepa rejection of power purchase and operating agreement.	0.60	765.00	459.00
12/21/20	JA	Review correspondence from Brown Rudnick regarding tolling agreement extension (.1); review tolling agreement (.1); review Order regarding status report (.3)	0.30	575.00	172.50
12/22/20	JHG	Review urgent contested motion regarding motion for extension of deadlines ECF 15487.	0.10	765.00	76.50
12/23/20	AMC	Review and analyze exhaustive order (DE 15496) concerning the Commonwealth's / AFAAF's motions for summary judgment.	1.20	375.00	450.00
12/28/20	JHG	Review email from J. Delgado to identify and analyze strategic litigation issues.	0.30	765.00	229.50
12/28/20	JHG	Review and analysis of ECF 15496, Judge Swain order denying motion for summary judgment.	0.80	765.00	612.00
12/28/20	JHG	Review ECF 15495, FOMB objection to Ambac motion for an order directing cash rule 2004 discovery.	1.00	765.00	765.00
12/28/20	JHG	Review ECF 71 in 20-0080, FOMB response.	0.40	765.00	306.00
12/28/20	JMS	Attention to tolling agreements and renewal of same.	1.30	500.00	650.00
<b>Subtotal: B191 / General Litigation</b>			53.70		\$28,437.73
<b>Total</b>			<b>99.50</b>		<b>\$42,505.73</b>

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
Invoice No. 100333

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#### Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	13.60	765.00	10,404.00
JMS	Jesus M Suarez	Partner	11.90	500.00	5,950.00
MGG	Mariaelena Gayo-Guitian	Partner	1.00	575.00	575.00
JA	John Arrastia	Partner	13.20	575.00	7,590.00
JAD	Joyce A Delgado	Associate	28.40	315.00	8,946.00
AMC	Angelo M Castaldi	Associate	13.40	375.00	5,025.00
AMC	Angelo M Castaldi	Associate	3.20	376.01	1,203.23
JNS	Jessey N Sardina	Paralegal	0.20	75.00	15.00
CE	Carolyn Esser	Paralegal	1.10	150.00	165.00
CBH	Colleen B Hopkins	Paralegal	0.40	195.00	78.00
JZ	Johana Zamora	Paralegal	13.10	195.00	2,554.50
<b>Total</b>			<b>99.50</b>		<b>\$42,505.73</b>

#### Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Pacer - Online Research	1,000.10
12/31/2020	Website domain and maintenance (12272-001) Trustpoint.One 20-12343	7,098.84

#### Total Costs incurrent and advanced

**\$8,098.94**

#### Current Fees and Costs

**\$50,604.67**

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 8, 2021  
Please Refer to  
Invoice Number: 100334

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

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**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services  
for the period ending Dec 31, 2020

18,347.50

Costs incurred and advanced

278.60

**Current Fees and Costs Due**

18,626.10

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.***

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 8, 2021

Please Refer to

Invoice Number: 100334

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

---

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Dec 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
12/01/20	JZ	Receipt and review of Order Granting PREPA's Motion for Extension of Time to file Response in the Marrero Plaintiff's Adversary 20-00115 [ECF No. 27]; calendar deadline; circulate same; update electronic case profile.	0.30	195.00	58.50
12/04/20	JZ	Receipt and review of UCC's Notice of Appeal From Order Denying Motion to Terminate Rule 9019 Motion [ECF No. 2320]; conference with J. Delgado regarding obtaining appellate case number; update electronic case profile.	0.40	195.00	78.00
12/10/20	JZ	Receipt and review of Joint Motion for an Order Setting an Agreed Briefing Schedule for a Motion to Dismiss the Amended Complaint in ADV 20-115; circulate same; update electronic case profile.	0.30	195.00	58.50
12/11/20	JZ	Review of briefing schedule on Joint Motion for an Order Setting an Agreed Briefing Schedule for a Motion to Dismiss the Amended Complaint in ADV 20-115; calendar deadlines and hearing date contained in order; circulate same; update electronic case profile.	0.40	195.00	78.00
12/11/20	JZ	Receipt and review of PREPA's Two Hundred Seventy-Fifth Objection to Amended Proofs of Claim relating to client [ECF No. 15418]; calendar hearing date and response deadline; e-mails from and to J. Suarez regarding same; update electronic case profile.	0.40	195.00	78.00
12/15/20	JZ	Receipt and review of the Order on Intervention and Staying Litigation entered in the Fuel Oil Adv No. 19-00388; circulate same; update electronic case profile.	0.40	195.00	78.00
<b>Subtotal: B110 / Case Administration</b>			2.20		\$429.00
<b>B150 / Meetings of Creditors</b>					
12/09/20	JA	Confer with client regarding litigation status.	0.40	575.00	230.00

PROMESA - Official Committee of Unsecured Creditors  
12272-002  
Invoice No. 100334

Page 2

12/14/20	JA	Prepare update on Fuel Oil litigation to Committee.	0.30	575.00	172.50
<b>Subtotal: B150 / Meetings of Creditors</b>			0.70		\$402.50
<b>B161 / Budgeting</b>					
12/11/20	JA	Revise September fee statements to conform with Fee Examiner requirements.	1.10	575.00	632.50
<b>Subtotal: B161 / Budgeting</b>			1.10		\$632.50
<b>B191 / General Litigation</b>					
12/01/20	PTK	Revised and finalized memorandum on research regarding [REDACTED]	1.60	310.00	496.00
12/07/20	JMS	Research concerning briefing of motion to dismiss in - 115 adversary proceeding in support of UCC's brief in opposition.	1.40	500.00	700.00
12/07/20	AMC	Legal research concerning Second and Third Circuit authorities concerning whether [REDACTED] consider various [REDACTED] addressing such issues.	2.20	375.00	825.00
12/08/20	AMC	Consider and analyze order concerning FOMB response to complaint in Adv. 20-115, and consider communications concerning going forward briefing schedule.	0.30	375.00	112.50
12/09/20	JHG	Review ECF 15312, order approving assumption of power agreements.	0.40	765.00	306.00
12/09/20	JHG	Review ECF 15313, order approving rejection of power sharing agreements.	0.30	765.00	229.50
12/10/20	JA	Review Joint Urgent Motion for Order Setting Agreed Schedule for Motion to Dismiss.	0.20	575.00	115.00
12/10/20	AMC	Continue preparation of motion to dismiss amended complaint filed by Marrero Plaintiffs	4.40	375.00	1,650.00
12/11/20	JMS	Review briefing schedule on Count 1 of Catesby Jones adversary proceeding (.2) and work on argument development (1.4)	1.60	500.00	800.00
12/14/20	JHG	Review email from J. Arrastia regarding status of Prepa case and analysis for strategy issues ECF 29 and 85 in 19-00388.	1.30	765.00	994.50
12/14/20	JA	Review court order in AP115 regarding briefing [DE 29] (.1); strategize (.6)	0.70	575.00	402.50
12/14/20	AMC	Analyze the Honorable Judge Dein's Order concerning Motion of Marrero Plaintiffs to Intervene in Adv. 19-388.	0.30	375.00	112.50
12/15/20	JA	Review Order on intervention and staying litigation and consider same regarding litigation strategy.	0.60	575.00	345.00

PROMESA - Official Committee of Unsecured Creditors  
12272-002  
Invoice No. 100334

Page 3

12/15/20	JMS	Attention to briefing Count 1 of Catesby Jones adversary proceeding (1.3); review order on intervention and strategize next steps (.5)	1.80	500.00	900.00
12/16/20	JMS	Continued development of issues in Catesby Jones litigation.	1.80	500.00	900.00
12/17/20	JMS	Attention to continued development of research assignments concerning Catsby jones.	2.40	500.00	1,200.00
12/17/20	JA	Review legal research and analysis regarding Fuel Oil Motion to Dismiss (1.1); strategize regarding litigation and motion (.4); prepare analysis and argument outlines as to specific elements of Motion to Dismiss (.6)	2.10	575.00	1,207.50
12/17/20	AMC	Review, analyze, and consider meet-and-confer letter drafted by counsel to the FOMB, and attend to internal communications concerning the same	0.20	375.00	75.00
12/17/20	AMC	Conduct legal research of federal bankruptcy authorities concerning standing to assert claims that are property of the estate (or the debtor) including all legal or equitable interests of the debtor in property as of the commencement of the case.	3.80	375.00	1,425.00
12/21/20	AMC	Received and analyzed ECF No. 15476 regarding deadlines in connection with Omnibus Motion to Approve Rejection of Purchase and Operating Agreements.	0.20	375.00	75.00
12/22/20	AMC	Analyze and conduct brief legal research concerning status of PREPA R.S.A., including Court's prior orders concerning the same.	0.40	375.00	150.00
12/23/20	JMS	Review issues concerning Catsby Jones Briefing	2.00	500.00	1,000.00
12/23/20	AMC	Continued preparation of dispositive motion to dismiss for filing in Adv. Proc. No. 20-115.	2.10	375.00	787.50
12/29/20	JMS	Attention to research in support of Catsby Jones as it relates to [REDACTED] litigation claims in Fuel Oil litigation.	1.70	500.00	850.00
12/30/20	JA	Review draft meet and confer correspondence (.6); email correspondence with L. Rappaport regarding meet and confer (.1)	0.70	575.00	402.50
12/30/20	JMS	Review meet and confer letter to Catsby Jones and identification of issues related to 541 of the Bankruptcy Code (.7); draft e-mail memorandum to team concerning same (.5)	1.30	500.00	650.00
<b>Subtotal: B191 / General Litigation</b>			35.80		\$16,711.00
<b>B260 / Meetings of and Communications with Board</b>					
12/07/20	JA	Confer with counsel for PREPA regarding proposed briefing schedule and coordination of AP 115.	0.30	575.00	172.50
<b>Subtotal: B260 / Meetings of and Communications with Board</b>			0.30		\$172.50

PROMESA - Official Committee of Unsecured Creditors  
12272-002  
Invoice No. 100334

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<b>Total</b>	<b>40.10</b>	<b>\$18,347.50</b>
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**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	2.00	765.00	1,530.00
JMS	Jesus M Suarez	Partner	14.00	500.00	7,000.00
JA	John Arrastia	Partner	6.40	575.00	3,680.00
PTK	Patrick T Kalbac	Associate	1.60	310.00	496.00
AMC	Angelo M Castaldi	Associate	13.90	375.00	5,212.50
JZ	Johana Zamora	Paralegal	2.20	195.00	429.00
<b>Total</b>			<b>40.10</b>		<b>\$18,347.50</b>

**Costs and incurrent and advanced**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Pacer - Online Research	278.60
<b>Total Costs incurrent and advanced</b>		<b>\$278.60</b>
<b>Current Fees and Costs</b>		<b>\$18,626.10</b>



**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 8, 2021  
Please Refer to  
Invoice Number: 100335

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the  
~~Government - Commonwealth of Puerto Rico~~

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**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-003

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government  
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services  
for the period ending Dec 31, 2020

4,015.50

Costs incurred and advanced

**Current Fees and Costs Due**

4,015.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.***

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

**Genovese Joblove & Battista, P.A.**

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Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 8, 2021

Please Refer to

Invoice Number: 100335

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the  
~~Government - Commonwealth of Puerto Rico~~

---

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Dec 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
12/03/20	JZ	Numerous e-mails and phone conferences regarding today's deadline to file reply brief in support of our motion to strike Dr. Gonzalez's testimony (.6); finalize and file reply in support in ADV. No. 19-356, 19-357, 19-359 and 19-361 (.9); circulate filed version and update electronic case profile (.3)	1.80	195.00	351.00
12/08/20	JZ	Receipt and review of Plaintiffs' Objection to Defendants' Motion to Strike Plaintiffs' Reply to Defendants' Response to Statement of Material Undisputed Facts in Support of Plaintiffs' Motion Pursuant to Bankruptcy Rule 7056 for Summary Judgment filed in ADV. 19-367; calendar deadline for responses; update electronic case profile.	0.30	195.00	58.50
12/16/20	JZ	Receipt and review of Defendants' Reply In Support Of Motion To Strike Plaintiffs Reply To Defendants Response To Statement Of Material Undisputed Fact filed in ADV. 19-367; circulate same; update electronic case profile.	0.30	195.00	58.50
<b>Subtotal: B110 / Case Administration</b>			2.40		\$468.00
<b>B191 / General Litigation</b>					
12/02/20	JA	Review drafts of Reply Briefs of Motions to Strike BONY MSJ (.6); review draft of Committee's Reply in Support of Motion to Exclude Expert Testimony of Gonzalez (.6); review form of vendor litigation settlement forms and draft informative motion (.2)	1.40	575.00	805.00
12/03/20	JA	Review revised and updated Reply to Motion to Strike and Motion to Strike Gonzalez (.3); review communications among counsel regarding Gonzalez Motion to Strike (.3); review and file Reply and Motion to Strike (.6)	1.20	575.00	690.00
12/03/20	AMC	Review, analyze, finalize, and ensure filing of the Committee and Special Claims Committee's reply brief for filing in APs 19-356, 19-357, 19-359, and 19-361.	1.80	375.00	675.00

PROMESA - Official Committee of Unsecured Creditors  
12272-003  
Invoice No. 100335

Page 2

12/08/20	JHG	Review ECF Doc. 146 in Case 19-00367 (ERS) plaintiffs objection to defendants motion to strike.	0.50	765.00	382.50
12/08/20	JA	Review Objection to Statement of Facts in support of MSJ in AP 367.	0.60	575.00	345.00
12/10/20	JMS	Review issues concerning summary judgment briefing and potential impact on litigation claims (1.3)	1.30	500.00	650.00
<b>Subtotal: B191 / General Litigation</b>			6.80		\$3,547.50
<b>Total</b>			<b>9.20</b>		<b>\$4,015.50</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	0.50	765.00	382.50
JMS	Jesus M Suarez	Partner	1.30	500.00	650.00
JA	John Arrastia	Partner	3.20	575.00	1,840.00
AMC	Angelo M Castaldi	Associate	1.80	375.00	675.00
JZ	Johana Zamora	Paralegal	2.40	195.00	468.00
<b>Total</b>			<b>9.20</b>		<b>\$4,015.50</b>

**Current Fees and Costs**

**\$4,015.50**

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 2, 2021  
Please Refer to  
Invoice Number: 100563

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

---

**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-001  
PROMESA - Official Committee of Unsecured Creditors  
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Jan 31, 2021	21,286.50
Costs incurred and advanced	
<b>Current Fees and Costs Due</b>	<b>21,286.50</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.***

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Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 2, 2021

Please Refer to

Invoice Number: 100563

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Jan 31, 2021

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
01/04/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.50	195.00	97.50
01/05/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.40	195.00	78.00
01/06/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.50	195.00	97.50
01/07/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.40	195.00	78.00
01/08/21	JA	Review Order regarding procedures.	0.10	575.00	57.50
01/08/21	JZ	Receipt and review of Order Regarding Procedures for hearing on certain claim objections scheduled for January 14th [ECF No. 15565]; calendar deadlines; update electronic case profile.	0.30	195.00	58.50
01/08/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.50	195.00	97.50
01/11/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.40	195.00	78.00
01/12/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.30	195.00	58.50
01/12/21	JZ	Receipt and review of Notice of Agenda of Matters Scheduled for the Hearing on January 14, 2021 [ECF No. 15578]; circulate e-mails regarding attendance; update electronic case profile.	0.30	195.00	58.50
01/13/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.40	195.00	78.00

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
Invoice No. 100563

Page 2

01/14/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.50	195.00	97.50
01/15/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.40	195.00	78.00
01/19/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.30	195.00	58.50
01/19/21	JZ	Receipt and review of Order Regarding Procedures for January 27-28, 2021 Omnibus Hearing [ECF No. 15653]; calendar deadlines; circulate same; update electronic case profile.	0.30	195.00	58.50
01/20/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.50	195.00	97.50
01/21/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.30	195.00	58.50
01/22/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.50	195.00	97.50
01/25/21	JZ	Receipt and review of Notice of Agenda of Matters Scheduled for the Hearing on January 27-28, 2021 [ECF No 15730]; circulate same; update electronic case profile.	0.30	195.00	58.50
01/25/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.40	195.00	78.00
01/26/21	JA	Confer and strategize with J. Zamora regarding status of various adversary proceedings.	0.60	575.00	345.00
01/26/21	JZ	Receipt and review of AAFAF's Status Report Regarding the Government of Puerto Rico's Recent Activities, Administration Transition and Response to the Ongoing COVID-19 Pandemic [ECF No. 15738]; circulate same; update electronic case profile.	0.30	195.00	58.50
01/26/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.30	195.00	58.50
01/26/21	JZ	Conference with J. Arrastia to discuss status of adversary proceedings and case as a whole.	0.60	195.00	117.00
01/26/21	JZ	Receipt and review of Oversight Board's Status Report in Connection with January 27-28, 2021 Omnibus Hearing [ECF No. 15739]; circulate same; update electronic case profile.	0.20	195.00	39.00
01/27/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.50	195.00	97.50
01/28/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.30	195.00	58.50
01/29/21	JZ	Review of daily litigation summary prepared by J. Delgado, including calendaring, and updating electronic case file.	0.50	195.00	97.50

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
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<b>Subtotal: B110 / Case Administration</b>			10.90		\$2,391.50
<b>B113 / Pleadings Review</b>					
01/04/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 1 through January 4, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.80	315.00	567.00
01/05/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 5, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.40	315.00	441.00
01/06/21	JAD	Conference call with counsel for Creditors' Committee to discuss status of proceedings, pertinent litigation issues, pending motions, and budget (.4); review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 6, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (.8)	1.20	315.00	378.00
01/07/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 7, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.20	315.00	378.00
01/08/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 8, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.30	315.00	409.50
01/12/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 12, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.30	315.00	409.50
01/13/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 13, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.30	315.00	409.50

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
Invoice No. 100563

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01/14/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for December 2, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.20	315.00	378.00
01/15/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 25, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.60	315.00	504.00
01/18/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 16 through January 18, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.20	315.00	693.00
01/19/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 19, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.80	315.00	567.00
01/20/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 20, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.40	315.00	441.00
01/21/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 21, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (1.4)	1.70	315.00	535.50
01/22/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 22, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.80	315.00	567.00
01/25/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 23 through January 25, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.40	315.00	756.00



PROMESA - Official Committee of Unsecured Creditors  
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01/26/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 26, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.30	315.00	409.50
01/28/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 28, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.50	315.00	472.50
01/29/21	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for January 29, 2021 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.40	315.00	441.00
<b>Subtotal: B113 / Pleadings Review</b>			27.80		\$8,757.00
<b>B150 / Meetings of Creditors</b>					
01/06/21	JMS	Prepare for and attend committee meeting	1.00	500.00	500.00
01/25/21	JA	Attend to Committee call regarding litigation and other issues.	0.50	575.00	287.50
<b>Subtotal: B150 / Meetings of Creditors</b>			1.50		\$787.50
<b>B160 / Fee/Employment Applications</b>					
01/05/21	MGG	Email to and from John Arrastia re: Eleventh Interim Application Period. Research and provide deadlines regarding same.	0.40	575.00	230.00
01/06/21	MGG	Review and approve September Fee Objection letter.	0.20	575.00	115.00
01/06/21	CAS	Prepare and serve GJB Monthly Fee Objection Statement for September (.4); E-mail correspondence with M. Guitian re: same (.1)	0.50	150.00	75.00
01/25/21	MGG	Receipt and review email from John Arrastia re: approved Budget and November Fee Statement. Review same and coordinate preparation of Monthly Fee Statement Letter.	0.30	575.00	172.50
01/28/21	MGG	Review email from John Arrastia with redacted November Statements. Office conference with Carolyn Esser. Email to and from J. Arrastia re: October invoices. Review October Fee Letter and invoices.	0.70	575.00	402.50
01/28/21	CAS	Review invoices for November 2020 (.5); preparation of monthly fee cover letter and Declaration of K. Forrest (.3); E-mail correspondence with M. Guitian and K. Forrest re: same (.2)	1.00	150.00	150.00

PROMESA - Official Committee of Unsecured Creditors  
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01/28/21	CAS	Preparation of Monthly Fee Cover Letter for November; Preparation of Declaration of Ken Forrest; E-mail correspondence with M. Guitian and K. Forrest re: same.	0.50	150.00	75.00
01/29/21	MGG	Confer with John Arrastia re: status of October invoices. Review Monthly Fee Statement for October. (.20). Review email for November and proceed with service of Monthly Letter and invoices (.30).	0.50	575.00	287.50
01/29/21	CAS	Finalize and serve November Fee statement on Fee Examiner, US Trustee and Oversight Board; E-mail correspondence with M. Guitian, K. Forrest and J. Arrastia re: same.	1.00	150.00	150.00
<b>Subtotal: B160 / Fee/Employment Applications</b>			5.10		\$1,657.50
<b>B161 / Budgeting</b>					
01/12/21	JA	Revise Fee Statements in conformity with Fee Examiner guidelines.	1.20	575.00	690.00
01/14/21	JA	Revise and finalize Fee Statements for transmittal to Committee.	0.30	575.00	172.50
01/28/21	JA	Redact statements to obscure privilege material.	0.30	575.00	172.50
<b>Subtotal: B161 / Budgeting</b>			1.80		\$1,035.00
<b>B191 / General Litigation</b>					
01/07/21	AMC	Revie and analyze Order Dismissing Remaining Counts and Counterclaims and Directing Entry of Judgment in the Above-Captioned Adversary Proceedings in light of the Court's Opinion and Order Denying the Government's Motions for Summary Judgment and Granting in Part the Oversight Board's Motions for Summary Judgment.	0.20	375.00	75.00
01/11/21	JHG	Review memorandum regarding creditor working group, call with mediation judges.	0.40	765.00	306.00
01/11/21	JHG	Review creditor update.	0.30	765.00	229.50
01/11/21	JA	Review Notice regarding additional mediation parties.	0.10	575.00	57.50
01/12/21	JHG	Review ECF 15579, urgent motion to extend deadline regarding power purchase agreement.	0.80	765.00	612.00
01/14/21	JHG	Review creditor update email.	0.60	765.00	459.00
01/18/21	JHG	Review email from J. Arrastia and analyze issues regarding proposed amended complaint.	0.40	765.00	306.00
01/18/21	JA	Review Ninth Amended Supplemental Verified Statement of LCDC	0.60	575.00	345.00

PROMESA - Official Committee of Unsecured Creditors  
12272-001  
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01/19/21	JHG	Review ECF 156, third urgent contested motion for extension of time.	0.30	765.00	229.50
01/19/21	JHG	Review and analyze UCC reply in support of committee and government parties regarding ERS bondholder issues motion.	0.80	765.00	612.00
01/19/21	JA	Review procedures motion.	0.10	575.00	57.50
01/21/21	JA	Review Joint Status Report DE 15690 (.3); review Informative Motion of Fee Examiner (.1); review Fee Examiner Report (.2)	0.60	575.00	345.00
01/25/21	JHG	Review agenda for January 27-28, 2021.	0.50	765.00	382.50
01/25/21	AMC	Review and consider 15-page Notice of Agenda of Matters scheduled for Jan. 27 Omnibus Hearing, and review and analyze "limited objection" of AMBAC to Motion to Approve Third Stipulation Regarding Tolling of Statute of Limitations.	0.40	375.00	150.00
01/26/21	JHG	Review status report regarding omnibus hearing filed by FOMB.	0.80	765.00	612.00
01/26/21	JA	Review FOMB status report (.2); review government status report (.2)	0.40	575.00	230.00
01/27/21	JHG	Review UCC email and memorandum regarding call with mediation judges.	0.80	765.00	612.00
01/27/21	JA	Attend Omnibus Hearing.	0.50	575.00	287.50
01/28/21	JMS	Attention to expiring tolling agreements.	1.50	500.00	750.00
<b>Subtotal: B191 / General Litigation</b>			10.10		\$6,658.00
<b>Total</b>			<b>57.20</b>		<b>\$21,286.50</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	5.70	765.00	4,360.50
JMS	Jesus M Suarez	Partner	2.50	500.00	1,250.00
MGG	Mariaelena Gayo-Guitian	Partner	2.10	575.00	1,207.50
JA	John Arrastia	Partner	5.30	575.00	3,047.50
JAD	Joyce A Delgado	Associate	27.80	315.00	8,757.00
AMC	Angelo M Castaldi	Associate	0.60	375.00	225.00
CAS	Carolyn A Scavone	Paralegal	3.00	150.00	450.00
JZ	Johana Zamora	Paralegal	10.20	195.00	1,989.00
<b>Total</b>			<b>57.20</b>		<b>\$21,286.50</b>

**Current Fees and Costs**

**\$21,286.50**

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 2, 2021  
Please Refer to  
Invoice Number: 100564

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

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**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services  
for the period ending Jan 31, 2021

10,672.50

Costs incurred and advanced

**Current Fees and Costs Due**

10,672.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.***

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 2, 2021

Please Refer to

Invoice Number: 100564

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

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FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Jan 31, 2021

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
01/05/21	JZ	Review of calendar; circulate internal e-mail regarding upcoming deadlines.	0.40	195.00	78.00
<b>Subtotal: B110 / Case Administration</b>			0.40		\$78.00
<b>B150 / Meetings of Creditors</b>					
01/29/21	JA	Update on AP115 to Committee Chair,	0.10	575.00	57.50
<b>Subtotal: B150 / Meetings of Creditors</b>			0.10		\$57.50
<b>B191 / General Litigation</b>					
01/04/21	AMC	Conduct legal research concerning derivative standing, and property-of-debtor issues as related to litigation claims.	1.30	375.00	487.50
01/05/21	JZ	Receipt and review of docketing statement filed in PREPA Appellate case 20-2162; circulate same; update electronic case profile.	0.40	195.00	78.00
01/07/21	JMS	Research in support of Catsby Jones briefing and attention to RSA/9019 issues.	1.90	500.00	950.00
01/07/21	AMC	Detailed review and consideration of prior PROMESA-related briefing on issues relating to claim ownership and PROMESA relationship to notion of "estate" under Section 541 of the Bankruptcy Code.	1.60	375.00	600.00
01/08/21	JMS	Research in support of Catsby Jones briefing and attention to RSA/9019 issues.	1.90	500.00	950.00
01/08/21	AMC	In related litigation against Vitol Inc., review and analyze numerous certified English-language translations of salient Commonwealth decisions pertaining to extant legal issues.	1.80	375.00	675.00

PROMESA - Official Committee of Unsecured Creditors  
12272-002  
Invoice No. 100564

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01/11/21	JA	Review correspondence from FOMB (.1); prepare correspondence to Plaintiffs' counsel regarding meet and confer (.1)	0.20	575.00	115.00
01/11/21	AMC	Prepare Motion to Dismiss Declaratory Judgment (amended) Complaint filed in 20-115, and conduct detailed and extensive research and analysis concerning numerous filings in the Marrero Plaintiffs' class action lawsuit and intervention briefing.	3.70	375.00	1,387.50
01/11/21	PTK	Respond to John Arrastia's email on where to find memo on the scope of extrinsic materials at the 12(b) stage	0.10	310.00	31.00
01/12/21	JA	Correspondence with counsel for FOMB regarding amended briefing schedule (.2); Reveiw and analysis of draft motion to dismiss Complaint in AP 155 and strategize regarding same (.1.1)	1.30	575.00	747.50
01/14/21	JMS	Continued research in support of Catsby Jones issues on motion to dismiss	2.30	500.00	1,150.00
01/18/21	JA	Review response of Plaintiffs to meet and confer letter.	0.10	575.00	57.50
01/18/21	JA	Review correspondence in AP 115 from Plaintiffs (.1); review correspondence from Oversight Board to Plaintiffs (.1); strategize regarding litigation strategy (.2)	0.40	575.00	230.00
01/20/21	JA	Review correspondence from plaintiff (.1); strategize (.3); email correspondence to FOMB counsel (.1)	0.50	575.00	287.50
01/21/21	JA	Confer with counsel for FOMB regarding issues in AP 115 (.2); review correspondence with Plaintiff (.1); review responsive communications (.1)	0.40	575.00	230.00
01/22/21	JMS	Work on briefing and analysis of matters arising from proposed amended complaint in connection with Catsby Jones adversary.	2.60	500.00	1,300.00
01/22/21	JA	Review Motion to Permit Second Amended Complaint and updated briefing schedule.	0.10	575.00	57.50
01/22/21	AMC	Extensive and detailed review and analysis of exhaustive briefings filed by PREPA in litigation adverse to Vitol Inc., and attend to related legal research of Commonwealth authorities concerning the same.	2.80	375.00	1,050.00
01/25/21	AMC	Review and analyze revised briefing schedule concerning Marrero Plaintiffs' forthcoming amended complaint, and internal communications concerning the same.	0.20	375.00	75.00
01/25/21	JZ	Receipt and review of Order Granting Leave to File Second Amended Complaint and Amended Briefing Schedule filed in ADV. 20-115; calendar hearing date and applicable deadlines; conference with A. Castaldi regarding same; update electronic case profile.	0.40	195.00	78.00
<b>Subtotal: B191 / General Litigation</b>			<b>24.00</b>		<b>\$10,537.00</b>
<b>Total</b>			<b>24.50</b>		<b>\$10,672.50</b>

PROMESA - Official Committee of Unsecured Creditors

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12272-002

Invoice No. 100564

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**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JMS	Jesus M Suarez	Partner	8.70	500.00	4,350.00
JA	John Arrastia	Partner	3.10	575.00	1,782.50
PTK	Patrick T Kalbac	Associate	0.10	310.00	31.00
AMC	Angelo M Castaldi	Associate	11.40	375.00	4,275.00
JZ	Johana Zamora	Paralegal	1.20	195.00	234.00
	<b>Total</b>		<b>24.50</b>		<b>\$10,672.50</b>

**Current Fees and Costs**

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**\$10,672.50**

**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 2, 2021  
Please Refer to  
Invoice Number: 100565

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the  
~~Government - Commonwealth of Puerto Rico~~

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**SUMMARY / REMITTANCE COPY**

Client/Matter # 12272-003

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government  
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services  
for the period ending Jan 31, 2021

2,296.50

Costs incurred and advanced

**Current Fees and Costs Due**

2,296.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.***

**Wiring and ACH Instructions:**

Bank Name: Biscayne Bank  
Bank Telephone: 305-447-5050  
Account Name: Genovese Joblove & Battista, P.A. - Operating  
Routing Number : 066015767  
Account Number : 21007711

**Remittance Address:**

Genovese Joblove & Battista, P.A.  
100 Southeast Second Street, 44th Floor  
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.  
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com



**Genovese Joblove & Battista, P.A.**

100 Southeast Second Street, 44th Floor  
Miami, Florida 33131  
Telephone (305) 349-2300 Facsimile (305) 349-2310  
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 2, 2021

Please Refer to

Invoice Number: 100565

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the  
~~Government Commonwealth of Puerto Rico~~

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FOR PROFESSIONAL SERVICES RENDERED  
for the period ending Jan 31, 2021

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 / Case Administration</b>					
01/15/21	JZ	Receipt and review of Urgent Motion of the Committees and Government Parties to Set Oral Argument Concerning Pending Motions in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued filed in ERS adv cases 19-356, 19-357, 19-359 and 19-361; circulate motion; update each electronic case file.	0.60	195.00	117.00
01/19/21	JZ	Receipt and review of Order Scheduling Briefing Schedule on the Urgent Motion of the Committees and Government Parties to Set Oral Argument Concerning Pending Motions in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued filed in ERS Adv cases 19-356, 19-357, 19-359 and 19-361; circulate order; calendar deadlines; update each electronic case file.	0.60	195.00	117.00
01/19/21	JZ	Receipt and review of the ERS Bondholder's Opposition to the UCC's Motion to Set Oral Argument Concerning Pending Motions in Certain Contested Matters and Adversary Proceedings; receipt and review of Puerto Rico Funds opposition to the UCC's Motion; receipt of government parties memorandum in support of its motion; circulate same; update electronic case profile.	0.60	195.00	117.00
01/22/21	JZ	Receipt and review of Order Granting Urgent Motion of the Committees and Government Parties to Set Oral Argument Concerning Pending Motions in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued filed in ERS adv cases 19-356, 19-357, 19-359 and 19-361; circulate order; calendar hearing date; update each electronic case file.	0.60	195.00	117.00

PROMESA - Official Committee of Unsecured Creditors  
12272-003  
Invoice No. 100565

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01/22/21	JZ	Receipt and review of The Puerto Rico Funds Sur-Reply in Response to Urgent Motion of the Committees and Government Parties Concerning Pending Motions in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico filed in the ERS adversary cases; circulate same; update electronic case profile.	0.50	195.00	97.50
01/22/21	JZ	Receipt and review of Statement of the Mediation Team Regarding the Committees and Government Parties' Urgent Motion to Set Oral Argument on Certain Litigation Related to Bonds Issued by the ERS; circulate same; update electronic case profile.	0.30	195.00	58.50
<b>Subtotal: B110 / Case Administration</b>			3.20		\$624.00
<b>B190 / Other Contested Matters</b>					
01/15/21	JA	Review draft Urgent Motion to Set Oral Argument in various contested matters and adversary proceedings (.2); confer with counsel at Brown Rudnick (.1)	0.30	575.00	172.50
<b>Subtotal: B190 / Other Contested Matters</b>			0.30		\$172.50
<b>B191 / General Litigation</b>					
01/18/21	JA	Confer with N. Bassett regarding coordination (.1); review Responses to Motion to Set Oral Argument (.2)	0.30	575.00	172.50
01/18/21	JA	Review Motions to Set Oral Argument.	0.10	575.00	57.50
01/19/21	JA	Review draft Motion for Default.	0.30	575.00	172.50
01/19/21	JMS	Review briefing issues and attention to timelines in connection with related matters handled by GJB.	1.40	500.00	700.00
01/19/21	AMC	Analyze and evaluate status of pending adversary proceedings light of Committees' urgent motion concerning extant summary judgment issues before the Hon. Judge Swain [ECF No. 15634]	0.60	375.00	225.00
01/22/21	JA	Review mediation team response to Motion to Set Oral Argument.	0.10	575.00	57.50
01/25/21	JA	Review Order Granting Oral Argument.	0.10	575.00	57.50
01/27/21	JA	Review Order of Referral regarding ADR.	0.10	575.00	57.50
<b>Subtotal: B191 / General Litigation</b>			3.00		\$1,500.00
<b>Total</b>			<b>6.50</b>		<b>\$2,296.50</b>

PROMESA - Official Committee of Unsecured Creditors

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12272-003

Invoice No. 100565

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**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JMS	Jesus M Suarez	Partner	1.40	500.00	700.00
JA	John Arrastia	Partner	1.30	575.00	747.50
AMC	Angelo M Castaldi	Associate	0.60	375.00	225.00
JZ	Johana Zamora	Paralegal	3.20	195.00	624.00
	<b>Total</b>		<b>6.50</b>		<b>\$2,296.50</b>

**Current Fees and Costs**

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**\$2,296.50**

**SCHEDULE 3**

**PROPOSED ORDER**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**In re:**

**THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,**

**as representative of**

**THE COMMONWEALTH OF PUERTO RICO, *et al.*,**

**Debtors.<sup>1</sup>**

**PROMESA  
Title III**

**No. 17 BK 3283-LTS**

**(Jointly Administered)**

**ORDER GRANTING FIFTH INTERIM FEE APPLICATION OF GENOVESE  
JOBLOVE & BATTISTA, P.A. AS SPECIAL LITIGATION COUNSEL TO  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES  
FOR PERIOD FROM SEPTEMBER 1, 2020 THOUGH JANUARY 31, 2021**

Upon consideration of the Fifth Interim Fee Application (the “Application”)<sup>2</sup> of Genovese Joblove & Battista, P.A. (“GJB”), as special litigation counsel to the Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA) (the “Committee”), for an order pursuant to sections 316 and 317 of PROMESA, section 503(b) of the Bankruptcy Code made applicable to these cases by section 301(a) of PROMESA, Bankruptcy Rule 2016, and Local Rule 2016-1, for allowance of compensation and reimbursement of expenses for the period from

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<sup>1</sup> The Debtors in these jointly-administered PROMESA title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Application.

September 1, 2020 through January 31, 2021, the Court hereby FINDS AND DETERMINES that (i) the Court has jurisdiction to consider the Application and the relief requested therein pursuant to section 306(a) of PROMESA; (ii) venue is proper before this Court pursuant to section 307(a) of PROMESA; (iii) due and proper notice of the Application has been provided under the particular circumstances and no other or further notice need be provided; (iv) any objections to the Application having been resolved; (v) all persons with standing having been afforded the opportunity to be heard on the Application; and after due deliberation and sufficient cause appearing therefor, it is hereby **ORDERED THAT:**

1. The Application is granted on an interim basis.
2. GJB's claim for fees and expenses for services rendered during the Application Period and reimbursement for actual and necessary expenses incurred during the Application Period are hereby allowed in the amounts of \$499,302.23 and \$31,381.55 respectively.
3. To the extent the amounts described in paragraph 2 hereof have not already been paid pursuant to the Interim Compensation Order, (a) the Debtors are directed to pay GJB the outstanding fees in the amount of \$135,460.40 which represents 100% of the fees requested within fourteen days of the date of this Order, and any such payment shall be made net of any payments made by the Debtors pursuant to the Interim Compensation Order, withholding or other applicable taxes, and (b) the Debtors are directed to reimburse GJB for its outstanding expenses in the amount of \$8,377.54, which represents 100% of the expenses requested within fourteen days of the date of this Order.
4. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.
5. GJB is authorized and empowered to take all necessary actions to implement the

relief granted in this Order.

6. Notwithstanding the possible applicability of Bankruptcy Rules 6006(d), 7062, 9014, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

Dated:\_\_\_\_\_, 2021.

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HON. LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE